



# LuxDev

the protection  
of personal data



## I. INTRODUCTION

In the context of the performance of its tasks, Lux-Development S.A. (hereinafter referred to as «LuxDev» or «we») collects and processes a number of personal data. LuxDev attaches paramount importance to the respect of privacy and the protection of the personal data of all persons concerned.

This is why we undertake to process your personal data securely and in compliance with the European Regulation of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter, the «GDPR») as well as with the applicable national law on the subject.

This information notice (or “privacy notice”) informs you about how we collect and process your personal information. We will detail the reasons (legal basis) for collecting your personal data, the purposes for which it is collected and the rights you have over your personal data and how you can exercise them.

## II. PERSON RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA

LuxDev has been working for development cooperation for 40 years and is unquestionably an operational pillar of Luxembourg’s bilateral cooperation system. We act as data controller for all processing operations listed in this information notice. Lux-Development S.A. is a company incorporated under Luxembourg law with its registered office at 10 Rue de la Grève, 1643 Luxembourg, registered in the Trade and Companies Register under number B16123.

### DATA PROTECTION OFFICER

LuxDev has appointed a Data Protection Officer (DPO) whom you may contact in order to exercise your rights (Chapter 6) and in case of questions or concerns regarding LuxDev’s personal data policies or practices. The DPO is assisted in his functions by a RGPD correspondent, You will find below the contact details:

#### DPO

Lux-Development S.A.  
DPO  
10, rue de la Grève  
L-1643 Luxembourg  
rgpd@luxdev.lu

## III. USE OF YOUR PERSONAL DATA

### WHEN YOU BROWSE OUR WEBSITE

As our website is intended to promote projects and programmes carried out by LuxDev, we work in collaboration with various partners and local authorities. However, this collaboration is of an editorial nature and has no impact on the way we process your personal data.

When you browse our website, we try to be as non-invasive as possible for your privacy. However, we do need some of your information to enable our website to function more efficiently and to be able to analyse its traffic. For this purpose, we apply certain cookies, which you can disable at any time. You can find more information about the cookies we set and how to disable them in our Cookie Management Policy.

### Links to third party websites made available to you

When you browse our website, we may provide links to third party websites (such as Facebook for example). We would like to make it clear that we share these links for your convenience and that once you are redirected to these other sites, we no longer have any control over the personal data you transmit to them by visiting their site. These sites have their own privacy policy, which we recommend you read carefully before submitting personal information to them.

#### Analysing our website traffic statistics

The processing of your personal data in the context of traffic monitoring is subject to user approval. The processing is non-nominative and allows LuxDev to better understand the interests of visitors to our site and to improve its content.

#### DURING A CONTRACTUAL RELATIONSHIP WITH US

During a contractual relationship, which may take various forms depending on the nature of the contract and the purpose of the service, your personal data necessary for the execution of this contract will be processed in accordance with the documents governing these procedures.

The length of time your data will be retained is also specified in each procedure and can be made available to you on request at [rgpd@luxdev.lu](mailto:rgpd@luxdev.lu)

We do not use the information you provide to generate automated decisions that may affect you.

#### MANAGEMENT OF INFORMATION REQUEST EMAILS

If you send us an information request via e-mail, we will retain your identification data (name, first name), e-mail address and the personal information you provide for the time necessary to respond to the request, after which they are securely archived and kept for one year. After that, we delete it permanently.

Our email servers are hosted in Europe.

The processing of your personal data in this context is necessary for the purposes of LuxDev's legitimate interests in order to follow up on your expression of interest and to ensure that we have responded to your request in a satisfactory manner (Article 6.1 (f) of the GDPR).

We do not use the information you provide to generate automated decisions that may affect you.

#### MANAGING YOUR APPLICATIONS

In order to manage your applications when you apply for a job vacancy via our website, we collect the personal information communicated via our form: your identification data (name, first name), civil status, date of birth, nationality, telephone number, your e-mail address, your current location, a copy of your CV, a covering letter, the source of your application, whether or not you have already worked for LuxDev.

The processing of your personal data in this context is based on your informed, specific and explicit consent (Article 6.1 (a) of the GDPR).

We keep the information you send us in the context of a recruitment for a period of one year from the end of the recruitment process. After this period, your consent will be required to remain on our database for a further one year.

We do not use the information you provide to generate automated decisions that may affect you.

#### WHEN YOU VISIT OUR PREMISES

If you visit our premises, we ask you to register in a visitors' log. The register is in paper format and contains the name and surname of the visitor, the date and time of the visit and the person visited.

The register is kept in a secure cabinet for one year and destroyed afterwards.

The processing of your personal data in this context is necessary for the purposes of LuxDev's legitimate interests in order to guarantee the security of our staff (Article 6.1 (f) of the GDPR).

#### WHEN YOU ATTEND ONE OF OUR EVENTS

From time to time, LuxDev organises events with its partners in the framework of cooperation projects. In this context we maintain lists of participants with contact information. If photos are taken during the event, you will have the possibility to exercise your image rights.

All this information is stored on our servers hosted in Europe and deleted at the latest one month after the event in question.

The processing of your personal data in this context is necessary for the purposes of LuxDev's legitimate interests in order to guarantee the security of our staff (Article 6.1(f) of the GDPR).



#### WHEN YOU REPORT AN INTEGRITY RISK

The Agency guarantees that a bona fide whistleblower will not be subject to retaliation.

If you send us an integrity alert via email or via the form on our website, we will keep your identification data (name, first name), email address and the personal information you provide for as long as it takes to complete the action, after which it is securely archived and kept for one year. After that, we delete it permanently.

The processing of your personal data in this context is necessary for the purposes of LuxDev's legitimate interests in order to follow up on your report and to ensure that the necessary measures have been taken (Article 6.1 (f) of the GDPR).

#### IV. WITH WHOM IS YOUR PERSONAL DATA SHARED?

We will not make your personal information available to any third party unless such transfers are

- based on your explicit consent;
- necessary for the performance of a contract that we signed;
- based on another legal basis;
- permitted or required by national or European legislation or by an order of a public authority or a judicial authority.

Where the processing of your personal data is based on any of the above, the following recipients may have access to it: public authorities, our hosting company and other suppliers and service providers (usually acting as processors or acting as data controllers).

Please note that where a transfer involves the transmission of your personal data to a country outside the European Economic Area and that country is considered by the European Commission not to provide an adequate level of protection for personal data, we will ensure that appropriate measures are put in place in accordance with applicable national and European data protection legislation.

#### V. HOW IS YOUR PERSONAL DATA SECURED?

In order to ensure an appropriate level of security when processing your personal data, we have put in place technical and organisational measures in line with industry practice. These measures include but are not limited to:

- raising awareness within our employees;
- authenticating users;
- managing authorisations;
- tracking access and managing incidents;
- securing workstations;
- securing mobile computing;
- protecting the internal IT network;
- securing servers;
- securing websites;
- securing Backup planning business continuity;

Une procédure relative à la violation de vos données à caractère personnel a été mise en place.



## VI. WHAT ARE YOUR RIGHTS AS A DATA SUBJECT?

You have a number of rights in relation to the processing of your personal data, which are detailed below:

### YOUR RIGHT OF ACCESS

You have the right to request copies of your personal information from us. This is an (almost) absolute right: if you request it, we will give it to you. However, there are some exceptions; this means that you will not always receive all the information we process (the list of personal information that can be requested is given in Article 15 of the GDPR).

### YOUR RIGHT TO RECTIFICATION

You have the right to ask us to correct information that you believe to be inaccurate. You also have the right to ask us to complete/update information that you consider incomplete. This is an absolute right: if you request it, we will make the change.

### YOUR RIGHT TO ERASURE

You have the right to ask us to delete your personal information in certain circumstances. This is not an absolute right: if you request it, we may or may not erase the data, depending on the circumstances, all of which are specified in the GDPR (Article 16 GDPR).

### YOUR RIGHT TO RESTRICT PROCESSING

You have the right to ask us to restrict the processing of your information, in certain circumstances (Article 18 GDPR).

### YOUR RIGHT TO OBJECT TO PROCESSING

You have the right to object to processing if the processing is carried out on the basis of our claimed legitimate interests and you consider that any of the processing being carried out infringes your privacy or causes you undue harm.

### YOUR RIGHT TO DATA PORTABILITY

You have the right to request that we transfer the information you have provided to us to another organisation, or that we provide it to you. This right only applies if we process information on the basis of your consent or in the course of negotiations for the conclusion of a contract, and the processing is automated.

### YOUR RIGHT TO WITHDRAW YOUR CONSENT

Where the processing of your data is based on consent, you have the right to withdraw your consent at any time.

### YOUR RIGHT TO COMPLAIN

You have the right to lodge a complaint with a supervisory authority (in particular in the EU Member State of your habitual residence, or place of work, or place of infringement) if you consider that the processing of your personal data violates applicable data protection legislation.



## VII. HOW TO EXERCISE YOUR RIGHTS

If you have any queries regarding the processing of your personal data and the exercise of your rights, you can contact us using the contact details set out in section 2.1.

Any request you make to us to exercise your rights will not incur any further costs. We will also do our best to respond to your request within one month (this period may be extended by a further two months if the request requires extensive research or if we have to deal with a large volume of requests).

We ask you to indicate in your request the right you wish to exercise, the reasons for your request and to attach a copy of both sides of your identity card. The request should specify the address to which the reply should be sent.

If you wish to exercise your right to lodge a complaint with a supervisory authority, you may also contact the National Commission for Data Protection via its website at <https://cnpd.public.lu> or write to it at the following address:

National Commission for Data Protection  
1, avenue du Rock'n'Roll  
L-4361 Esch-sur-Alzette

## VIII. UPDATES TO THIS PRIVACY NOTICE

We regularly review this privacy notice and, where appropriate, update it as our services and procedures and the use of personal data change. If we wish to use your personal data in a way that we have not yet identified, we will contact you to provide you with information about this and, if necessary, to ask for your consent.

We will update the date of this document whenever it changes.



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