



fidupar

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## Privacy Policy

In the context of its business activities, FIDUPAR is brought to record and view a collection of personal data such as name, surname, address (physical and digital), civil status, date and country of birth, tax residence, occupation, telephone numbers, hereinafter referred to as "Data", of individuals with which it has or intends to enter into a business relationship, hereinafter referred to as "Customers", and to operate them in an analog or digital form and via an automated processed or not.

FIDUPAR also registers a set of Data, such as the name, first name, digital address, of individuals with whom it has been or is in contact, or who have expressed an interest in being kept informed of FIDUPAR's activities and / or events, hereinafter referred to as "Contacts" and exploits them in an analog or digital form and via an automated process or not.

FIDUPAR processes such Data in the authorized limits and the respect of the General Regulation on Data Protection (EU) 2016/679, hereinafter referred to as "GDPR", which is directly applicable in all Member States of the European Union and relates to the protection of individuals with regard to personal data.

In case of modification of the GDPR, FIDUPAR may adapt, if necessary, this policy and notify the Customer / Contact applicable changes by posting an updated version of this policy.

The Data available to FIDUPAR are collected from the Customer as part of the commercial relationship between the Customer and FIDUPAR. This business relationship may relate to one or more of the following (not exhaustive): offer, service contract, tracking customer satisfaction, analysis, consulting, event, notification etc.

Within the limits of the GDPR, FIDUPAR may use other sources of public data such as print or digital directories, social networks and the Internet to correct or supplement the processed Data.

As controller, FIDUPAR uses the collected Data to ensure the business relationship between the Customer and FIDUPAR, to ensure its legal and regulatory obligations as a professional in the financial sector, to ensure the legitimate interests of FIDUPAR in case of disputes, for marketing purposes and for statistical analysis and evaluation purposes.

In the context of targeted marketing, FIDUPAR may request the consent of the Customer / Contact who has the right to withdraw or modify its Data on request or via unsubscription .

Data collected from the Customer / Contact may be communicated, if necessary, to subcontractors, if they are in relation with services requested by the Customer / Contact and provided by these subcontractors. They may also be communicated to subcontractors being legal advisers in the event of disputes or late payments, as well as to competent authorities and courts within the limits of the stated purposes and the legitimate powers of these entities.

No data will be transferred outside the Grand Duchy of Luxembourg, or outside the European Union. FIDUPAR agrees not to resell Customer / Contact Data and also not to communicate them or make them accessible to third parties, without any reason relating to the primary purposes that bind the Customer / Contact to FIDUPAR.

Customer / Contact Data are kept for at least as long as applicable legislation in financial, commercial and regulatory matters dictates, and such preservation may therefore go beyond the business relationship as such.

The Customer / Contact has the right to access their Data, have them corrected, receive them for transmission to another provider, and in the limit of the legislation in force, to get them erased, to get their process limited or to oppose such treatment.

To exercise any of these rights, the Customer / Contact may apply to FIDUPAR, 44 avenue JF Kennedy, L-1855 Luxembourg. FIDUPAR has appointed a Data Protection Officer, reachable by email at [data.protection.officer@fidupar.eu](mailto:data.protection.officer@fidupar.eu). Any claim input is to be sent to the National Commission for Data Protection (CNPD).

Specific provisions shall apply to FIDUPAR employees and suppliers.

**FIDUPAR**

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*Privacy policy – May 2018*