



HACA PARTNERS

Audit & Governance

Privacy Policy

Last updated: October 19, 2020

Protection of your privacy is an important concern for HACA Partners and we commit to be transparent about the data we collect about You, how it is used and with whom it is shared. This Privacy Policy, including our Cookie Policy, applies to Our websites

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy.

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions.

The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

- **You** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.
- **Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to HACA Partners S.à r.l., 6, route d'Esch – L-1470 Luxembourg.
- **Affiliate** means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.



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- **Account** means a unique account created for You to access our Service or parts of our Service.
- **Website** refers to HACA Partners websites <http://www.hacapartners.lu/>, <http://www.hacapartners.com>, <http://www.hacapartners.fr>, <http://www.hacapartners.sn>.
- **Service** refers to the Websites.
- **Country** refers to Luxembourg.
- **Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.
- **Third-party Social Media Service** refers to any website or any social network website through which a User can log in or create an account to use the Service.
- **Personal Data** is any information that relates to an identified or identifiable individual.
- **Cookies** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Collecting and Using Your Personal Data

Types of Data Collected and how we collect those data

1. Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Personal identification information: Name, Email address, phone number
- Usage Data



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2. Usage Data

Usage Data is collected automatically when using the Service via your browser's cookies.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

Use of Your Personal Data

Your personal data will be treated as strictly confidential. We have taken appropriate technical and organisational security measures against its loss or unlawful processing.

HACA Partners may use Personal Data for the following purposes:

- **To provide and maintain our Service**, including to monitor the usage of our Service.
- **To provide You** with news and general information about services and events unless You have opted not to receive such information.
- **To manage Your requests** to Us.

We may share your personal information in the following situations:

- **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of our Service.
- **For Business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business to another company.



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- **With other users:** when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside. If You interact with other users or register through a Third-Party Social Media Service, Your contacts on the Third-Party Social Media Service may see Your name, profile, pictures and description of Your activity. Similarly, other users will be able to view descriptions of Your activity, communicate with You and view Your profile.

How do we store your data?

All personal information collected through this website will be stored and processed by HACA Partners in accordance with the General Data Protection Regulation ("GDPR").

HACA Partners undertakes not to transfer your personal data to any third party without your prior consent or if required by law or legal requirements. HACA Partners will keep the data for as long as required for the provision of its services and subject to the legal limitation period.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

Disclosure of Your Personal Data

Business Transactions

If HACA Partners is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).



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Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

Marketing

HACA Partners would like to send you information about products and services of ours that We think You might like.

If You have agreed to receive marketing, You may always opt out at a later date.

You have the right at any time to stop Our Company from contacting you for marketing purposes.

If you no longer wish to be contacted for marketing purposes, please send a mail to dpo@hacapartners.lu.

What are your data protection rights?

HACA Partners would like to make sure You are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request Our Company for copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request that Our Company correct any information you believe is inaccurate. You also have the right to request Our Company to complete the information you believe is incomplete.



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The right to erasure – You have the right to request that Our Company erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that Our Company restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to Our Company's processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If You make a request, We have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: dpo@hacapartners.lu

Detailed Information on the Processing of Your Personal Data

Service Providers have access to Your Personal Data only to perform their tasks on Our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

We use third-party Service providers to monitor and analyze the use of our Service such as **Google Analytics**

Google Analytics is a web analytics service. Read the Privacy Policy for Google Analytics here: <https://policies.google.com/privacy>

Tracking Technologies and Cookies

HACA Partners uses cookies and other technologies to ensure everyone who uses our Service has the best possible experience.



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For more information about the cookies we use and your choices regarding cookies, please visit our Cookie Policy.

How to contact Us

If you have any questions about this Privacy Policy, You can contact us by email:

dpo@hacapartners.lu

How to contact the appropriate authority

Should you wish to report a complaint or if you feel that Our Company has not addressed your concern in a satisfactory manner, you may contact the CNPD

CNPD (Commission Nationale pour la Protection des Données)

1, avenue du Rock'n'Roll
L-4361 Esch-sur-Alzette

Tél. : (+352) 26 10 60 -1

www.cnpd.lu