



HACA PARTNERS

Audit & Governance

Cookies Policy

Last update:

May 4, 2021



HACA PARTNERS

Audit & Governance

Content

1. Definitions.....	3
2. Do HACA PARTNERS websites use cookies?	4
3. What is a cookie?	4
4. How do We use cookies?.....	4
5. What types of cookies does hacapartners.lu use?	4
5.1. Necessary / Essential Cookies	5
5.2. Cookies Policy / Notice Acceptance Cookies	5
5.3. Functionality Cookies.....	5
5.4. Tracking and Performance Cookies	5
6. What third-party cookies do HACA PARTNERS websites use?.....	6
7. How to manage cookies?	6



HACA PARTNERS

Audit & Governance

This policy provides detailed information about how and when HACA PARTNERS use cookies on its different websites.

1. Definitions

Term	Definition
You	You mean 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)	Company (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to HACA PARTNERS Sàrl, 6, route d'Esch – L-1470 Luxembourg.
Affiliate	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.
Account	Account means a unique account created for You to access our Service or parts of our Service.
Website	Website refers to HACA PARTNERS websites http://www.hacapartners.lu/ ,
Service	Service refers to the Website.
Country	Country refers to Luxembourg.
Service Provider	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	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.



HACA PARTNERS

Audit & Governance

Term	Definition
Personal Data	Personal Data is any information that relates to an identified or identifiable individual.
Cookies	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	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).

2. Does hacapartners.lu use cookies?

As described in Our Privacy Policy, We use cookies and other technologies to ensure everyone who uses Our Website has the best possible experience. By continuing to visit or use Our services, You are agreeing to the use of cookies and similar technologies for the purposes We describe in this policy.

3. What is a cookie?

Cookies are text files placed on Your computer to collect standard Internet log information and visitor behaviour information. When You visit Our Website, We may collect information from You automatically through cookies or similar technology

4. How do We use cookies?

Our Company uses cookies in a range of ways to improve Your experience on Our Website and analyse Our Service, including:

- Keeping You signed in
- Understanding how You use Our Website

5. What types of cookies do HACA PARTNERS website use?

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your Web browser.

We use both session and persistent Cookies for the purposes set out below:



HACA PARTNERS

Audit & Governance

5.1. Necessary / Essential Cookies

Type: Session Cookies

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

5.2. Cookies Policy / Notice Acceptance Cookies

Type: Persistent Cookies

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

5.3. Functionality Cookies

Type: Persistent Cookies

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering Your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter Your preferences every time You use the Website.

5.4. Tracking and Performance Cookies

Type: Persistent Cookies

Administered by: Third-Parties

Purpose: These Cookies are used to track information about traffic to the Website and how users use the Website. The information gathered via these Cookies may directly or indirectly identify You as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device You use to access the Website. We may also use these Cookies to test new pages, features or new functionality of the Website to see how Our users react to them.



HACA PARTNERS

Audit & Governance

6. What third-party cookies do HACA PARTNERS website use?

The table below lists the third party cookies on Our sites. Please note that the names of cookies, pixels and other technologies may change over time.

Cookie Name	Description	Expiration	Opt-Out
_gat	Google Analytics	1 minute	Google Opt-Out
_ga	Google Analytics	2 years	Google Opt-Out
_gid	Google Analytics	1 day	Google Opt-Out

7. How to manage cookies?

You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of Our Service.

Most internet browsers are initially set up to automatically accept cookies. You can change the settings to block cookies or to alert You when cookies are being sent to Your device. There are a number of ways to manage cookies. Please refer to Your browser instructions or help screen to learn more about how to adjust or modify Your browser settings.

Browser manufacturers provide help pages relating to cookie management in their products. Please see below for more information.

- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari \(Desktop\)](#)
- [Safari \(Mobile\)](#)
- [Android Browser](#)
- [Opera](#)
- [Opera Mobile](#)

For other browsers, please consult the documentation that Your browser manufacturer provides.

If You have any questions on Your personal data, or any questions or complaints regarding this Cookie Policy, please contact Us dataprotection@hacapartners.lu.

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

15, Boulevard du Jazz

L-4370 Luxembourg

Tél. : (+352) 26 10 60 -1

www.cnpd.lu