

Privacy Policy

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1. Purpose of the Policy

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 describes our policies and procedures on the collection, use and disclosure of your information, as well as your privacy rights.

2. How do we use your Personal Data?

HACA PARTNERS may use your Personal Data for the following purposes:

- To provide services,
- To manage commercial relations and update customer files,
- To provide you with news and general information about services and events,
- To manage your requests,
- To detect and combat fraud,
- To manage disputes and collect debts,
- To pay for services,
- Etc.

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

We may combine the information we collect from you with data obtained from other sources, in order to improve our services and help us personalize our interactions with you.

3. When do we share or transfer your Personal Data?

We share your personal data with your consent or if it is necessary to provide you with a service you have requested or authorized.

Your personal data may be shared with service providers working on our behalf, or acting as subcontractors for HACA PARTNERS, who may need access to personal data to provide a service or help protect and secure our systems and services. In such cases, these companies must comply with our data privacy and security requirements and are not permitted to use the personal data we pass on to them for any other purpose.

We also share your data when required by law, to respond to legal proceedings, to protect our customers and for the management of litigation and debt collection, and for the settlement of benefits.

Your data is processed in our offices and other locations where our partners are based. This might involve transferring data across borders. In case of data transfers, we take all necessary steps to ensure your data is handled securely and in accordance with this privacy policy.

4. How do we protect your Personal Data?

The personal information we collect is kept in a secure environment. The people working for us are trained to respect the confidentiality of your information. To ensure the security of your personal data, we limit it to the strict minimum and use the following measures:

- SSL (Secure Sockets Layer) protocol;
- Access rights - authorized person;
- Network Perimeter security;
- IT backup;
- Login / password;
- Protection against Malware (Antivirus, updates, etc.);
- Firewalls.

We are committed to maintaining a high level of confidentiality by integrating the latest technological innovations to ensure the confidentiality of your transactions.

5. What are your data protection rights?

HACA PARTNERS would like to make sure you are fully aware of all of your data protection rights.

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.

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 by email: dpo@hacapartners.lu.

6. How long do we keep your Personal Data?

We retain your personal data only for as long as necessary to provide the services that you have requested, including legal or contractual needs.

The criteria considered in determining retention periods include the following:

- Necessity of conservation to supply the requested services;
- Sensitivity of the data collected or entrusted;

- Specific consent or agreed limitation;
- Legal or contractual obligation;
- Retention policy adopted by HACA Partners.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

7. How to contact us?

If you have any questions about this Privacy Policy or should you wish to exercise your rights, you can contact us by email: dpo@hacapartners.lu.

8. How to contact the supervisory authority?

Should you wish to report a complaint or if you feel that we have not addressed your concern in a satisfactory manner, you may contact the CNPD.

CNPD (Commission Nationale pour la Protection des Données)

15, Boulevard du Jazz

L-4370 Luxembourg

(+352) 26 10 60 -1

www.cnpd.lu