### ECHO is operated by the Agence luxembourgeoise d'action culturelle a.s.b.l. (ALAC)

#### **CONFIDENTIALITY POLICY**

The purpose of the present notice is to define the conditions under which the non-profit-making association "Agence luxembourgeoise d'action Culturelle", established with its registered office at Cercle Cité, Place d'Armes, L-2012 Luxembourg, registered with the Luxembourg Trade and Companies Register under number F744 (hereinafter referred to as "we" or the "ALAC") collects and processes the personal data of the users navigating on ECHO (hereinafter referred to as "Users" or "you") accessible through following web addresses <a href="www.eventsinluxembourg.lu">www.eventsinluxembourg.lu</a> and www.eventsinluxembourg.com (the "Site").

# What are the personal data processed by the ALAC?

Personal data is any information which can be used, either directly or indirectly, to identify a natural person.

With the exception of cookies, mentioned below, we do not collect any personal data other than that which you voluntarily enter on the Site or provide to us spontaneously by email, in particular to contact us or to take advantage of our services.

This information includes, but is not limited to, your first and last name, email address, postal address and telephone number.

### For what purposes are such personal data collected and processed?

The personal data collected by the ALAC (the "**Personal Data**") are processed by the ALAC for the following purposes:

- to communicate with you and to provide you with the information you request,
- to give you access to the services offered on the Site. Within this context, your data shall be processed for the sole purpose of verifying compliance with the GCU of the request to add an event, to register an event on the Site or to contact the User in case of questions or need for additional information,
- to promote the events registered on the Site,
- to promote the ALAC's activities by sending newsletters, subject to your prior express request to do so,
- to process requests for access, rectification and opposition, as well as other rights relating to personal data,
- to manage complaints and disputes,
- to prepare visit statistics,
- to display personalised content according to the interests and preferences of Users.

Personal Data are necessary for the provision of the services requested by the User, as well as to enable the ALAC to fulfil its legal obligations. It is also necessary for the ALAC's legitimate interest to promote its activities and to improve the browsing experience on the Site.

These purposes form the legal basis for the ALAC's data processing.

#### To whom are the collected Personal Data transmitted?

Personal Data are processed internally by duly authorised persons, within the limits of their respective responsibilities.

They may also be communicated to the ALAC's partners, to the competent administrative and legal authorities, as well as to the ALAC's subcontractors (in particular IT service providers) and external service providers, such as web designers, communication agencies, and so on, to the extent strictly necessary and subject to the existence of contractual guarantees to ensure the security and confidentiality of the data.

## **How does the ALAC protect the Personal Data which it processes?**

The Personal Data thus collected by the ALAC are processed by it, as the data controller, in compliance with the applicable data protection legislation (namely, in particular, Regulation (EU) 2016/679 of the European Parliament and Council dated 27 April 2016 and the Law of 1 August 2018 on the organisation of the National Commission for Data Protection and the general regime on data protection relating to the protection of persons with regard to the processing of personal data, as well as any other subsequent regulations).

The ALAC undertakes to implement technical and organisational security measures to ensure the protection of Personal Data against the risks associated with the use of information systems.

The ALAC complies with generally accepted security standards to protect the personal data of Site Users. However, no method of transmission over the Internet, or of electronic storage, is 100% secure. Therefore, the ALAC cannot guarantee the absolute security of Personal Data.

Personal Data shall be retained for three years.

## What rights do Users have?

In accordance with the law currently in force, Users shall be entitled free of charge to obtain:

- access to their Personal Data,
- confirmation as to whether or not Personal Data concerning them are being processed,
- information on at least the purposes of the processing, the categories of data being processed and the recipients or categories of recipients to whom the data are disclosed, as well as
- communication, in an intelligible form, of the Personal Data undergoing processing.

Within the limits provided for by the applicable texts, the User shall also be entitled to rectify Personal Data concerning them and to oppose the collection and processing of such data, subject to providing substantiation in relation to their particular situation. They shall also be entitled to request the deletion of all or part of the data or a limitation of the processing, and to make use of their right to data portability.

These rights can be exercised by sending an e-mail to the following address: dataprotection@agenceculturelle.lu. We may ask you to provide us with a scan of your identity document in case of doubt, so that we can verify your identity before processing your request.

You may also withdraw your consent to receive newsletters at any time, either by following the instructions on the e-mail or by sending us an e-mail to the above address.

For more information on how your Personal Data are managed or how to exercise any of the above rights, please contact us at the above address.

You also have the possibility of lodging a complaint, in the event of failure(s) to comply with the rules applicable to the protection of personal data, with a supervisory authority such as the National Commission for the Protection of Data (CNPD), the registered office of which is at 1 Avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette.

## What is a cookie?

The Site uses "cookies" and similar tools. "Cookies" are small text files left on your computer when you visit the Site. They collect information about your operating system, including your Internet Protocol (IP) address, browser and operating system, date and time of visit, registration information, browsing history and user preferences.

Some cookies are necessary for you to benefit from the full functionality of the Site, while others are used to prevent fraudulent use of login information and to protect User data from unauthorised third parties. Others are used to enable and facilitate navigation on the Site, in particular by memorising the User's navigation preferences or by avoiding the need to re-enter personal information.

These cookies do not require your consent prior to their deposit. You can nevertheless oppose them by configuring your Internet browser accordingly. However, such deactivation could prevent the use of certain features of the Site.

Other cookies used by the ALAC on the Site require your prior consent. These are cookies used for the purposes of:

- statistical analysis and traffic management. These cookies are used to improve the ergonomics of the Site and the interest of its services, as well as to enable us to develop new services or functionalities;
- sharing content on social networks; and
- targeted advertising. These cookies enable us to offer you advertising tailored to your interests.

The ALAC may use the services of third parties for analysis and targeted advertising purposes, such as via Google. The use of these cookies is subject to Google's privacy policy.

You can withdraw your consent to the use of cookies by emailing us at dataprotection@agenceculturelle.lu or by configuring your browser settings to refuse cookies.

Cookies are deleted 13 months after their date of deposit in the User's device.