

## Privacy Policy

This policy describes how we use Personal Data that you provide during your visit to this website, your rights and choices, and how you can contact us about our privacy practices.

In collecting personal data, we act as Data Controller. We take the protection of your personal data very seriously and treat your personal data confidentially and in accordance with the General Data Protection Regulation EU 2016/679 or GDPR

### 1. About our firm:

We are the accounting firm SCHAEFFER & PARTNERS S.A. The company is established at 12, Avenue de la Porte Neuve, L-2227 Luxembourg and is represented by Mr Michel Schaeffer, Managing Director. You can contact us by e-mail at [info@schaeffer-partners.lu](mailto:info@schaeffer-partners.lu), at our postal address and by telephone at: (+352) 26262285.

We are not required to have a Data Protection Officer (DPO), so all enquiries regarding the use of your personal data should be addressed to the above contact details.

### 2. The website: [www.schaeffer-partners.lu](http://www.schaeffer-partners.lu) is developed by the company:

SCHAEFFER & PARTNERS S.A.

### 3. The website: [www.schaeffer-partners.lu](http://www.schaeffer-partners.lu) is hosted by the company:

VISUAL ONLINE S.A.  
P.O. Box: 2534 L-1025 Luxembourg  
Offices: Z.I. Weiergewan 6, rue Goell L-5326 Contern

### 4. When you log on to our User Portal

When you connect to our User Portal either via the connection button provided for this purpose on our website [www.schaeffer-partners.lu](http://www.schaeffer-partners.lu) or via the link : <https://schaeffer-partners.licent.app/> you access the data shared between you and SCHAEFFER & PARTNERS S.A..

The access to your information is carried out via a login and a password.

These identifiers can be obtained by contacting your contact person within SCHAEFFER & PARTNERS S.A.

Your interactions with the User Portal are recorded for a period of 12 months. This information allows us to verify and ensure the security of the systems as well as to be able to audit the interactions carried out on the Portal.

The Portal uses Cookies that are strictly necessary for its proper operation and therefore do not require your consent.

## **5. Data sharing and transfer**

Your personal data are not transferred to any third parties.

We will not use your personal data to make automated decisions that may affect you.

## **6. Policy on Cookies on the website**

We only use Cookies that are strictly necessary for the proper functioning of our website so your consent is not required.

## **7. Your rights as a data subject**

The GDPR provides the following rights for individuals:

**Right of access:** You are entitled to obtain both access to and a copy of the personal data processed, on request

**Right to rectification:** You are entitled to obtain a rectification of your personal data if they prove to be inaccurate or incomplete

**Right to erasure:** You are entitled to obtain the erasure of your data when there is no longer a valid reason for processing them

**Right to limitation of processing:** You are entitled to obtain a limitation of processing of your data that is inaccurate or no longer necessary

**Right to object:** You are entitled to obtain a cessation of the processing of your data where there are no legitimate and compelling reasons for processing them

**Right to data portability:** You are entitled to obtain the transfer of your data to a third party in an accessible format

**Rights related to automated processing and profiling:** You are entitled to obtain that data are not processed fully automatically without human intervention

If we need to process any of your personal data in a manner other than that previously identified, we will contact you to provide you with information about this and to seek your consent if necessary.

## **8. Your right to complain**

If you have a complaint about our use of your personal data, you can contact us directly or contact the Luxembourg regulatory body:

**National Commission for Data Protection  
(Commission Nationale pour la Protection des Données)**

1, avenue du Rock'n'Roll  
L-4361 Esch-sur-Alzette  
Tel: (+352) 26 10 60 -1

## **9. Updates to our privacy policy**

We update our privacy policy regularly. If the use of your personal data changes, if we wish to use your personal data in a manner other than that to which you have given your consent, we will contact you to provide you with additional information and, if necessary, to request your consent again.