

## TREATMENT OF PERSONAL DATA

The Law Firm “Tabery & Wauthier - Richard Sturm” (hereinafter – the “**Law Firm**”) treats relevant personal data in strict compliance with all applicable laws and regulations related to the privacy, data protection, confidentiality or security of personal data, including European Union directives and regulations governing the protection of personal data, and notably the Regulation EU 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter – the “**GDPR**”).

The personal data processed is the information concerning the clients of the Law Firm and, if applicable, the other natural persons whose related personal data are provided to the Law Firm at the time of the conclusion of the contract and/or during its execution.

Such personal data may include, but are not limited to:

- a) The identification details such as name, surname, date and place of birth, user numbers;
- b) The contact information such as email address, domicile address or civil residence, phone number; and
- c) The other relevant personal details such as nationality and citizenship;
- d) The government identification numbers including copies of ID cards;
- e) The financial and banking information (notably for payment and invoicing purposes); and
- f) any other personal data reasonably provided to the Law Firm.

Identity and contact details of the controller:	Law Firm “Tabery & Wauthier - Richard Sturm”  Address : 10 rue Pierre d'Aspelt, L-1142 Luxembourg  Phone number : +352 251 51 51  Fax : +352 45 94 61  E-mail : <a href="mailto:avocats@tabery.eu">avocats@tabery.eu</a>
Purposes of processing for which personal data are intended and legal basis of processing:	Personal data are processed to the extent necessary to protect the interest of the clients of the Law Firm, to provide them legal services, to ensure their legal representation,

	<p>and to administer the human resources of the Law Firm.</p> <p>Personal data are processed to the extent that at least one of the following applies:</p> <ul style="list-style-type: none"> <li>• the data subject has given consent to the processing of his or her personal data for one or more specific purposes (article 6 (1) (a) of the GDPR);</li> <li>• processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (article 6 (1) (b) of the GDPR);</li> <li>• processing is necessary for compliance with a legal obligation to which the controller is subject (article 6 (1) (c) of the GDPR);</li> <li>• processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child (article 6 (1) (f) of the GDPR).</li> </ul>
<p>Recipients or categories of recipients of personal data (including in third countries):</p>	<p>Recipients will be defined on a case-by-case basis: courts and tribunals, public authorities, contractors and business partners of the clients including bankers, arbitration institutions, domiciliation agents, accountants and other service providers, other recipients to whom the interests of client require the transfer of data.</p> <p>Data transfers (including in third countries) are necessary for the fulfilment of the contractual</p>

	obligations of the Law Firm as well as for the exercise or defence of legal claims.
Period for which the personal data will be stored, or the criteria used to determine that period:	<p>The personal data will be treated for the duration necessary for the treatment as defined.</p> <p>The data will be stored, after the end of the mission of the Law Firm, during the applicable statutory limitation periods.</p>

The data subjects may at any time exercise the following rights:

- a) Access, free of charge at reasonable intervals, the personal data held about them and receive additional information about how it is processed;
- b) Rectify any inaccurate personal data or complete any incomplete personal data;
- c) Seek the erasure of their personal data when the processing of their personal data is no longer necessary for the purposes described supra, when the data subjects withdraw their consent to a specific processing (to the extent that consent justifies this processing), when the processing is not or no longer lawful for any reasons, when the erasure is necessary to comply with the applicable law or when the data subjects object to the processing or in the absence of any overriding legitimate ground for such processing;
- d) Receive the personal data relating to the data subject and transmit them to another data controller to the extent that the legitimacy of the processing lies on contractual performance and is carried out by automated means;
- e) Seek the restriction of the processing, for instance when the subject contests the accuracy of the personal data or when the processing is not or no longer compliant with the applicable law and the data subject has objected to the erasure of the personal data. Such restriction will result in the personal data being, with the exception of storage, only processed in specific cases (including exercise or defence of legal claims); and
- f) Withdraw their consent at any time to the processing, to the extent that the legitimacy of such processing lies on consent without affecting the lawfulness of processing based on consent before its withdrawal.

Personal data are not processed using any automated decision techniques.

Any changes of personal data must be promptly notified by the data subject to the Law Firm.

In addition, the data subject has a right to file a complaint with the Luxembourg data protection authority, the “*Commission nationale pour la protection des données*” (CNPD).

Hereafter, the contact details of the “Commission nationale pour la protection des données”:

Address: 1, avenue du Rock’n’Roll, L-4361 Esch-sur-Alzette

Telephone: (+352) 26 10 60 -1

Fax. : (+352) 26 10 60 - 29

Website: <https://cnpd.public.lu/en.html>

Web-form: <https://cnpd.public.lu/en/droits/faire-valoir/formulaire-plainte.html>