

Privacy Policy

*This privacy policy is based on the European GDPR regulation ¹
(EU) 2016/679 which came into force on 25 May 2018.*

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1. Introduction

Caritas Luxembourg's mission is to promote social inclusion in Luxembourg and around the world. Supporting vulnerable people is our core concern. Caritas Luxembourg is thus a banner for Christian-inspired social action which focuses on the quality of the service provided for people in distress. In order to do this, we need you and your generosity.

Our commitment to transparency in respect of the information collected about you, its use and the bodies we share it with is central to our mission.

This **Privacy Policy** applies whenever you make use of our benefits, services, activities, publications, events, hereinafter referred to as "services", as a beneficiary, donor, legatee, sponsor, training course participant, applicant, staff member, volunteer, owner (non-exhaustive list), hereinafter referred to as "users".

We offer our users several choices in respect of the data we collect, use and share, as described in this **Privacy Policy**.

¹ General Data Protection Regulation

2. Data collected

The data collected comprises the data you provide us with (sign-up to newsletters, training courses etc.) and data received by public authorities within the framework of agreements pertaining to the completion of our missions. This data is neither passed on to any company, nor other organization nor third party, whether based in Luxembourg or abroad. In compliance with the European regulation on the protection of individuals with regard to the processing of personal data (GDPR 2016/679), you have the right to access, rectify and object to the processing of such data.

As recommended by the regulation, the data collected is kept to the minimum necessary to carry out our services.

3. Use of your data

We use your data to provide, support, customise and develop our Services. Our use of your personal data depends on the services you use.

Confidentiality clause

The confidentiality of your data is guaranteed on a daily basis. Every internal employee has signed a confidentiality clause in their contract of employment. Each volunteer signs an annual agreement to maintain the confidentiality of personal data that is essential to the completion of his/her mission.

Aggregated information

We use your data to produce aggregated information which cannot be used to identify you. For example, we may use your data such as your donations, and the frequency and sum thereof, for the sole purpose of generating statistics about our campaigns, thus respecting your anonymity.

Transfer to third parties

We only transfer your data to third-parties for the purpose of completing certain specific tasks. Sometimes we entrust your data to third parties. For example: printing tax certificates and putting them in envelopes. To do this, we enter into confidentiality agreements with each of our subcontractors. Your data are also transferred to public authorities under the various agreements necessary to carry out our missions. For example: claims for the reimbursement of certain benefits to the CNS (Caisse Nationale de Santé - National Health Fund).

4. Your rights and obligations

Data storage

We store your personal data for as long as you have an account or for as long as is necessary to provide you with the services. This includes the data you have provided to us as well as data generated or derived from your use of our services. Even if you only use our services sporadically, we retain your information and maintain your profile until such time as you request deletion of your data. We keep accounting data for 10 years: this is a legal requirement. Generally, in other cases, files are kept in our archives for 10 years unless otherwise provided for by the law or required by one of our funders.

Rights to access and inspect your personal data

You have the right to access your personal data and request its deletion. In respect of the personal data that we hold in relation to you:

- **Access to your data:** You can ask to see the list of personal data recorded in our systems.
- **Modification or correction of the data:** You can ask us to modify, update or correct your data in certain cases, in particular if it is inaccurate.
- **Objections, limitations, restrictions on the use of data:** you can ask us to cease using all or part of your personal data (for example, if you no longer wish to receive paper mail) or to limit our use of it (for example, limited solely to distribution of the newsletter).
- **Deletion of data:** As provided for by the regulation, you can withdraw your consent² at any time. You can ask us to delete all or part of your personal data (for example, if it is no longer necessary for us to provide the services); Deletion will be refused if processing of your data is necessary to comply with a legal or regulatory provision or is necessary for the performance of a contract.

Who to contact:

- For all modifications or corrections of data, you can contact the department concerned using the references published on our website: www.caritas.lu.
- For any disputes, claims and other rights in accordance with the GDPR, you can contact our Data Protection Officer ("DPO"³) at dpo@caritas.lu or DPO, 29 rue Michel Welter, L-2730 Luxembourg.
- In case of a regress, you can do an appeal to the control authorities, the CNPD, info@cnpd.lu.

² Consent must be "free, specific, informed and unambiguous".

³ Data Protection Officer

5. Security

Caritas Luxembourg has complied with the new European regulation (GDPR 2016/679), and has adapted its systems, procedures, and contracts.

We take security measures intended to protect your data, such as secure access to our applications, servers, website etc. Today's security situation obliges us to regularly monitor our systems in order to detect and prevent any vulnerabilities and attacks.

Despite the constant search for security breaches, and despite our constant attention to security measures, unfortunately, an absolute protection of information cannot be guaranteed.

6. Privacy policy in respect of our website www.caritas.lu

Our cookies policy including the cookie pixel of Facebook applies to your use of our services: We use your data in order to determine which services are most suited to your profile and we can offer you these services when you connect to our site or Facebook.

This information is used by Caritas Luxembourg anonymously and only for statistical purposes. You have the possibility to accept or refuse the use of cookies before browsing the site or on Facebook with the exception of cookies strictly necessary for the functioning of the website. By deactivating the cookie(s) relating to statistics, no data will be collected and you will no longer be part of our statistics.

7. Your computer, tablet, telephone and your geographical location

When you connect to the Internet, the data from your devices and network connections, including location data is registered. When you consult or leave the services (including our plug-ins, cookies or similar technologies on third-party sites), the URL of the site you are leaving is registered on your device.

If you use our services on a mobile device, this device will send us data on your geographical location depending on your telephone's settings.

Any modification made to the Privacy policy is applicable to your use of our Services subsequent to the "date of entry into force".