

This document constitutes the policy for the processing of personal data by the DKDB law firm, applicable from March 1st 2019. "DKDB" stands for the law firm "DUPONG, KRIEPS, DU BOIS & DIAS VIDEIRA, avocats à la Cour".

The data processing policy is made in accordance with EU Regulation 2016/679 of the European Parliament and the Council of 27 April 2016, entered into force on 25 May 2018.

The EU regulation 2016/679 and the data processing policy of the DKDB law firm apply exclusively to the personal data of natural persons, excluding legal persons.

I. Controller ;

The entity responsible for the processing of personal data is the law firm "DUPONG, KRIEPS, DU BOIS & DIAS VIDEIRA, avocats à la Cour", an association of lawyers without legal personality of its own, located at L-2628 Luxembourg, 9, rue Trévires.

Within the law firm itself, Me Valérie DUPONG (info@dkdb.lu) deals in particular with the implementation of the policy of processing personal data.

II. Collection and processing of personal data, means of treatment and purpose of treatment ;

a) When you charge one of our lawyers in defending your interests, we always collect the following personal data:

- surname ;
- first name ;
- surname and first name of the opponent party ;
- date of birth & national identification number ;
- private and / or professional address ;
- e-mail address ;
- number(s) of landline and mobile phone ;
- civil status ;
- information concerning your employer.

b) Depending on the nature of the case, we may collect some of the following personal data:

- copy of the identity card or passport ;
- VAT number ;
- data on affiliation to Social Security (CNS, CNAP, AAA, etc.), ADEM and other social organizations ;
- information about your personal life (habits, hobbies, family situation, etc.) ;
- property status ;
- professional situation ;
- income ;
- Bank account numbers ;
- health data ;
- data on judicial convictions: criminal and other;
- everything else that is necessary for the execution of the mandate.

The law firm will limit to collecting data necessary and useful to the processing of the file.

We collect and process data :

- to be able to identify you as our client ;
- to be able to detect possible conflicts of interest ;
- in the context of our legal obligations relating to the law against money laundering and financing of terrorism ;
- to be able to advise you and defend your interests in justice and elsewhere;
- to correspond with you ;
- to prepare our bills ;
- to recover our costs and fees and to engage your responsibility.

The data will be used by the law firm, its associates, collaborators, trainees and staff in fulfilling the mandate you have given to one of the lawyers in the firm.

All the people who have access to your data in the firm are bound by a professional secret.

Your personal data may, depending on the need of the file, be entrusted to subcontractors, corresponding lawyers, third party attorneys, bailiffs, courts and opposing lawyers in connection with the communication of documents, or as part of files concerning only advice, in negotiations, transactions etc., and in any case to the accountant, the banker, the public authorities, insurances and any other person necessary and / or useful for the proper management of your file.

III. Location of data storage ;

Your identification data (last name, first name, address, e-mail address and telephone number) are kept in the client directory of the office.

Your identification data as well as personal data specific to your case will be kept in whole or in part in a computer file specifically dedicated to your file. This data is also stored in whole or in part in a paper folder specifically dedicated to this file.

IV. Duration of the data processing ;

The law firm will retain your data for the duration of the contract, plus the period in which the lawyer's or the firm's liability may be jeopardized (5 years after the dossier has been completed) or as long as any other legal requirement or the litigation evidence it requires.

Except as stated in the previous paragraph, the basic data listed under II. a), dashes 1 to 3, may be kept for a period of 20 years, in order to detect any conflicts of interest.

V. Your rights ;

a) Right to information

You have the right to know who processes your personal data, why and for what purposes. In the event of a security breach resulting in a breach of personal data that may create a high risk for your rights and freedoms, the controller must inform you as soon as possible.

b) Right to access

Upon request, the data controller must provide you with all personal data about you. It is recalled that the personal notes taken by the lawyer are the exclusive property of the lawyer and will not be accessible for you.

c) Right of rectification

You have the right to request the rectification of your personal data to the controller.

d) Right to be forgotten

If the law firm no longer has a legitimate reason to keep your data, it must delete your personal data on your request within a reasonable time.

e) Right to portability

You have the right to retrieve the data you have provided in a structured, commonly used and readable format and to pass it on to a third party, provided that the processing of the data has been done using automated processes and is based on your consent or contract between you and the law firm or one of its lawyers.

f) Right to object

You have the right to object at any time to the processing of your personal data for the future. Your opposition is only applies for the future and not for the past.

Your right to oppose does not apply when the treatment is required by law or if there are legitimate and compelling reasons to process the data or when the process is necessary for the exercise of our rights in court.

g) Right to restriction

You have the right to request restriction of your data :

- if you contest the accuracy of a personal data, for a period enabling the controller to verify the accuracy of the personal data,
- if the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead,
- if you require the data for the establishment, exercise or defence of legal claims.

In case of restriction, your data can no longer be processed.

h) Right to complain

You have the right to exercise your rights directly with the controller.

If your complaint has remained unfulfilled, you can contact the CNPD (www.cnpd.lu)

You also have the right to seize the court.

The present personal data processing policy may be modified at any time and will never constitute a right acquired by the client.

Luxembourg, March 1st 2019.