



PRIVACY NOTICE

Last update: 06.02.2023

Introduction

Under the European Regulation of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (the "GDPR"), this Privacy Notice (the "Notice") informs you about how Absolute Blue S.A. (after this "Absolute Blue" or "we") collects and processes, as controller, personal information about you when you browse or contact us through our website.

1. What personal data is collected?

Data you provide us. We process the personal data you provide to us when you fill in the contact form on our website, including but not limited to your name, surname, email address, any personal contained in your message. The provision of your data is not mandatory but is necessary for us to respond to you.

Data relating to correspondence and other communications. We collect your personal data when you contact us by telephone, post or email, we will generally retain this correspondence or communication.

Data relating to website use. We collect information about your browsing of the website through cookies. When you browse our website, we try to be as non-invasive as possible to your privacy. You can find more information about the cookies we use in our [Cookie Policy](#).

2. Why is my personal data collected and on what legal basis?

This section explains the purposes for which we use the personal data we collect and the legal basis for our processing. We ensure that any processing of your personal data has an appropriate legal basis.

To respond to your requests. We use your personal data to process and respond to your request for contact, information or a commercial proposal that you have requested. When you contact us via our website using our contact form, we process your data based on your consent (Article 6.1, a) of the GDPR).

Our form has a box that you need to tick to submit your request. By ticking this box, you are giving us your consent to use your personal data for the purposes mentioned above. You can withdraw your consent at any time by sending us your request to the email address mentioned in section 8 below.



To communicate effectively with you. When you contact us by telephone, post or email, we process the contact details you provide to communicate with you based on our legitimate interest - i.e., we have legitimate business interests in responding to you and your personal data is necessary to do so (Article 6.1, f) of the GDPR).

To ensure the proper functioning and security of our website. We collect information about the use and effectiveness of our website through cookies. These technical cookies are strictly necessary for the operation of our website and we do not ask for your consent to place them on your computer. This processing is based on our legitimate interest - i.e., we have legitimate interests in ensuring the proper functioning and security of our website (Article 6.1, f) of the GDPR).

As part of legal or regulatory obligations. We may also have to process your personal data to comply with regulatory requirements or to interact with regulators, where appropriate. When we use your data for these purposes, we do so on the basis of the legal obligations to which we are subject (Article 6.1, c) of the GDPR) or our legitimate interest in cooperating with public and supervision authorities (Article 6.1, f) of the GDPR).

Under no circumstances do we use the information you provide to us to make automated decisions about you.

3. Who are the recipients of my personal data?

In principle, your personal data is not made available to third parties and is only processed internally by our team to respond to your requests, to follow up on these requests and, more generally, to communicate with you.

We may, however, disclose your personal data to different recipients when this is strictly necessary for one of the purposes mentioned above. These recipients can be public authorities, supervision authorities and our service providers. We contractually require these service providers to use your personal data only to the extent necessary to provide services to us.

4. Is my personal data transferred outside the European Union?

In principle, your personal data is processed in the European Union and is not intended to be processed or transferred outside the European Economic Area (EEA). However, we may transfer your information outside the EEA where required by applicable law or public or supervisory authorities.

5. How long is my personal data kept?

The retention periods for your personal data depend on our business needs and the requirements of local legislation. We retain your personal data for as long as is necessary for the processing purposes for which the information was collected and as required and/or permitted by applicable law.

6. How is my personal data secured?

We implement technical and organisational security measures to prevent any breach of your personal data, whether accidental or malicious.



To protect your personal data against the risks of destruction, loss or unauthorised access, we are putting in place appropriate security measures. These measures include technical measures relating to the data and systems used for processing, as well as organisational measures.

7. What are my rights concerning the processing of my personal data?

As a visitor to our website, you have several rights relating to processing your personal data, such as the right access to your data, the right to rectification, the right to erasure, and the right to restriction of the processing. In addition, you have the the right to withdraw consent at any time.

You also have the right to lodge a complaint with a supervisory authority if you consider that the processing of your personal data breaches the applicable legislation on the protection of personal data. In Luxembourg, the competent authority is the Commission Nationale pour la Protection des Données ("**CNPD**").

8. How can I exercise my rights?

If you wish to exercise your rights or have any questions regarding the processing of your personal data, you can contact us by e-mail at the following email address : gdpr@absoluteblue.eu.

Your request to exercise your rights will not normally incur any costs. We will also do our best to respond to your request within one month.

Please indicate in your request the right you wish to exercise and the reasons for your request. Please note that if there is reasonable doubt about your identity, we may ask you for additional information.

If you wish to exercise your right to complain to a supervisory authority, you can also contact the CNPD via its website at <https://cnpd.public.lu/en/particuliers/faire-valoir/formulaire-plainte.html> or write to the following address:

Commission Nationale pour la Protection des Données

15, Boulevard du Jazz
L-4370 Belvaux

9. Updating of this Notice

We regularly review this Notice and, where appropriate, update it as our services and personal data processing evolve. If we wish to use your personal data in a way that we have not yet identified, we will contact you to provide you with information about this and, if necessary, to seek your consent.

We will update the date of this Notice whenever it changes.