

CHINALUX

Privacy Policy

The China-Luxembourg Chamber of Commerce (“**CHINALUX**”) is a private, non-profit organisation supporting bilateral trade and cultural ties between China and Luxembourg

CHINALUX processes your personal data in accordance with the applicable legislations, particularly:

- Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (“GDPR”);
- The Act of 1 August 2018 on the organisation of the National Data Protection Commission and the general data protection framework.

CHINALUX undertakes to process personal data in a fair and transparent way and based on valid legal grounds, obtained for specific lawful purposes, adequate, relevant and not excessive; accurate and kept up to date; not held for longer than necessary, protected in appropriate ways and not transferred outside of the European Economic Area, unless adequate protective measures are in place.

Our privacy policy particularly covers the following issues:

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If you receive the present policy in electronic format, please click on the links below to be immediately directed to the relevant information.

We reserve the right to update our personal data protection policy in line with any changes in legislation or in the way we treat your personal data. Every modification made will be notified on the Website.

Please visit our Website frequently to be aware of any changes and modification to our present policy.

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WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

Your personal data is processed by Chambre de Commerce Chine-Luxembourg A.S.B.L., established and having its registered office at L - 2981 Luxembourg, 7, rue Alcide de Gasperi, registered with the Luxembourg Business Registers under registration number F9609 (“CHINALUX”, “We” or “Us”), acting as the “data controller” in respect of the processing of your personal data.

For any concerns regarding your personal data feel free to contact, either by:

E-mail: privacy@china-lux.lu

Telephone: +352 691 866 352

WHO IS CONCERNED?

We may collect Personal Data of the following data subjects:

- Potential new members presenting their application;
- Individual Members and representatives of Corporate Members (also only “Members”);

- Members of the Governing Bodies and Committees, including their collaborators;
- CHINALUX's friends subscribing to Our eNewsletter on <https://china-lux.lu/>
- Participants in events, conferences, meetings;
- Our Service providers;
- Our Business partners;
- Website users contacting Us via the contact form on <https://china-lux.lu/>, by email at events@china-lux.lu or at info@chinalux.lu
- Members giving us their feedback by using the Members Corner form on <https://china-lux.lu/>

WHAT KIND OF PROCESSING DO WE PERFORM AND WHY ?

The chart below explains how we use your personal data, being (i) the different types of data being processed, (ii) the persons concerned, (iii) the legitimate purpose, (iv) the legal basis of the treatment.

In this context, Our "*legitimate interest*" shall mean in particular:

1. the pursuit of our activities to promote business and culture between Luxembourg and China;
2. the protection of our Association, benefits of Members;
3. the improvement or further development of our activities, standards, guidelines.

PURPOSES of the processing	WHAT ? data is processed	WHO's? data is processed	Which LEGAL BASIS ?
Management of Memberships including Membership fees	<u>Identification data</u> : first name, last name, nationality or Country of registration; <u>Contact data</u> : such as email address, telephone number, postal address; <u>Professional data</u> : organisation / Member name, Position job title, website, locations of offices in China, industry/expertise; <u>Preferences</u> : (informal events, missions to China, sponsorship opportunities, networking, conferences); <u>Payment and reimbursement data</u> : VAT number, bank account details.	<i>Potential Members and Members</i>	<i>Contractual and pre-contractual measures, Legal obligation and legitimate interests</i>
Management of the association including its governing bodies and committees	<u>Identification data</u> : first name, last name, nationality, date and place of birth, signature, passport or ID (including personal characteristics age, gender, nationality as shown on the ID and Physical data photo and height as shown on your ID); <u>Contact data</u> : country of residence.	<i>Members which are part of the Governing Bodies and Committees</i>	<i>Legal obligations</i>
Internal and external Communication (marketing) e.g. Members corner / eNewsletters/ invitations	<u>Identification data</u> : first name, last name; <u>Contact data</u> : Member name, email address, IP address (refer to Cookies section); <u>Preferences</u> : (informal events, missions to China, sponsorship opportunities, networking, conferences).	<i>Members, CHINALUX's friends,</i>	<i>Your consent and our legitimate interests</i>
Management of Our service providers and our IT and business infrastructure	<u>Identification data</u> : such as first name, last name; <u>Contact data</u> : such as email address, telephone number, postal address, company name; contact person; <u>Payment and reimbursement data</u> : VAT number, bank account details; <u>Professional data</u> : job title, employer, professional tasks.	<i>Service providers</i>	<i>Contractual and pre-contractual measures</i>

<p>Management of events, conferences and meetings or other activities in line with our missions to promote business and culture between Luxembourg and China</p> <p><i>Including management of sponsorships and co organisation of events with Business Partners</i></p>	<p><u>Identification data</u>: first name and last name, <i>images taken upon registration or during events*</i>, dietary requirements;</p> <p><u>Contact data</u>: such as email address, telephone number, postal address, company name, contact person;</p> <p><u>Professional data</u>: job title or position, employer, relationships with business in China;</p> <p><u>Payment and reimbursement data</u>: VAT number, bank account details.</p>	<p><i>Members, Attendees to events organised by CHINALUX or by Business Partners, Friends of CHINALUX, Service Providers</i></p>	<p><i>Contractual and pre-contractual measures Your consent, Our Legitimate interest</i></p>
<p><i>* Management of external communications (promotion of CHINALUX activities and events), images taken upon registration or during events</i></p>	<ul style="list-style-type: none"> • When you register for Our event or events that we co organised with Business Partners, you will be informed and you will consent that pictures can be taken during our event. Pictures of participants may also be published online or in publication released by CHINALUX for the purpose of promoting Our event and/ or related activities of CHINALUX. • Should you disagree to a possible publication of your picture, you can always object by contact us directly. 	<p><i>Members, Attendees to events organised by CHINALUX or by Business Partners, Friends of CHINALUX, Service Providers</i></p>	<p><i>Your consent and Our Legitimate interest</i></p>
<p>Management of the Website pages and groups on social media (LinkedIn and Twitter)</p>	<p><u>Identification and contact data</u>: first name and last name, images taken upon registration as Member or during events, data associated with the profile on social networks; IP address (see Cookies section); content shared on the page within the group.</p>	<p><i>Members, Business Partners, visitors of CHINALUX Social Media group/page/Website Attendees to event</i></p>	<p><i>Your consent, Our Legitimate interest</i></p>

HOW DO WE OBTAIN YOUR PERSONAL DATA?

We may collect the above-identified Personal Data directly from you on several occasions such as:

- directly from you;
- when you fill in the Membership form;
- when you register for an event;
- when you participate in an event;
- when you communicate with Us via email or via Our online contact form on Our Website;
- without your prior information and consent, which we will request in advance and in an appropriate manner, according to the circumstances.

DO WE USE COOKIES ?

Cookies are text files which are placed in a dedicated area of the hard drive of your device (computer, tablet, mobile phone or any other device optimized for the Internet) when viewing online content or advertising. Such Cookie files can only be read by their issuer. A Cookie file allows its issuer, during its period of validity, to recognize the relevant terminal each time the terminal accesses a digital content with Cookies of the same issuer.

We only use so-called "*technical*" and "*Analytics*" cookies:

- **Essential cookies** : they are essential for the running of our website. If these cookies are blocked by the browser, you may no longer be able to enjoy certain features of our website. These cookies are sent exclusively by our website.
- **Analytics cookies** : they allow us to create usage statistics of our website. This information helps us to improve the functionalities of our website.

Google Analytics provides an "opt-out" mechanism that blocks the tracking of its services. Most web browsers can be configured to warn users of attempts to set cookies or to limit the type of cookie they accept. Please refer to the help section of your browser to find out what options your browser offers.

All recent versions of popular browsers give you a level of control over cookies. You can set your browser to accept or reject all, or certain, cookies. Please be aware that some areas of our website may not function after you have changed your cookie settings.

WHO WE SHARE YOUR PERSONAL DATA WITH?

Insofar as they are necessary for the purposes defined in this policy, your Personal Data may be shared internally with other Members, Members of the Governing Bodies and Committees and employees of CHINALUX.

Certain of your Personal Data may be shared externally when necessary to achieve the purpose for which they have been processed, with the following entrusted third parties:

- Our processor for payment purposes based in Luxembourg;
- Our accounting and tax service provider based in Luxembourg;
- Our event management service providers based in the European Economic Area ("EEA ") as well as in the US ;
- Our service providers in the organisation of events (e.g. catering, venue management, communication agencies etc.).

These entrusted third parties may be required to receive or have access to some of your Personal Data in different ways, each according to their roles, in line with the purposes specified above and within the limits set by the applicable law. When needed, we stipulate processing agreements with such third parties so to ensure the maximum protection of your Personal Data.

We may also transferred, when required, your Personal Data to the local public authorities such as the Luxembourg Business Registers, to our lawyers, to the public bailiffs, to the police etc., in order to comply with the legal or regulatory requirements to which we are subject or to assert our rights or exercise them in Court.

→ Events with other Business Partners

From time to time, we may organise events with Business Partners so as to co organise joint events. The organisation and follow up of these events may entail the processing and sharing of your Personal Data both by us and the co-organiser. In this context, you will be informed by both of us as joint data controllers on how and for which purposes your Personal Data are processed, in conformity with the applicable legislation.

WHICH COUNTRIES DO WE TRANSFER YOUR PERSONAL DATA TO?

Your Personal Data will not in principle be transferred to a third country outside the EEA or an international organisation.

However, in the event that it would be necessary for the purposes defined in this policy, we may have to transfer your Personal Data to countries outside the European Economic Area, which may not offer the same level of data protection as the Grand Duchy of Luxembourg. Some of these countries, such as the US, are subject to an adequacy provision by the European Commission and the transfer of data to such countries is in principle safe.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We commit to keeping your Personal Data only for the period necessary for the purposes set out in this Privacy Policy.

In determining this period, we take into account the following criteria:

- the requirements of applicable data protection laws;
- the duration of the applicable legal prescription;
- the purposes of the processing involving your data and whether and for how long the processing of your data is necessary to serve such purposes;
- our legal obligations to keep certain information for a minimum period.

In particular, we will for example apply the following time limits:

- books and accounting documents will be retained for a period of 10 years from the end of the financial year to which they pertain;
- data concerning non retained potential Members will be retained for a maximum period of 1 year after the rejection of the candidature;
- data concerning Members will in principle not be retained after a period of 2 years following :
 - the non-payment of its annual fee,
 - its leave or its exclusion from the association.
- data processed on the basis of your consent will not be kept by Us in the event you withdraw your consent.

YOUR RIGHTS REGARDING YOUR PERSONAL DATA

The GDPR provides you with specific rights according to the legal basis on which CHINALUX bases the processing of your Personal Data.

In this context, you have:

- **A right of access:** you have the right to obtain confirmation on whether your personal data are being processed or not. When this is the case, you have the right to access the personal data which are processed by CHINALUX.
- **A right of rectification:** you have the right to obtain rectification of inaccurate or incomplete information about you that is processed by CHINALUX.
- **A right to the erasure of your data:** you have the right to obtain the erasure of your Personal Data in the following situations: (i) your data are no longer necessary for the purposes for which we collected them; (ii) you withdrew your consent where the processing is based on consent and there is no other legal basis for such processing; (iii) you object to the processing of your Personal Data and there is no compelling legitimate reason justifying the processing; (iv) the data is subject to unlawful processing; (v) the data must be erased due to a legal obligation.
- **A right of opposition:** you can oppose the processing of your Personal Data in two situations: (i) where the processing concerned is based on your consent, in which case you can oppose such processing without having to provide any particular reasons; (ii) where the processing is based on the legitimate interests of CHINALUX, you can oppose it for reasons related to your particular situation, unless we are able to demonstrate that there are legitimate grounds and imperative reasons for such processing which prevail over your interests, rights and freedoms, or else for the verification, exercise or defense of our rights in Court.
- **A right to limitation of the processing of your data:** you have the right to suspend processing of Personal Data while a verification is being carried out (verification of the accuracy of information, of the legal basis of processing, and of the legitimate reasons that CHINALUX opposes to their erasure).
- **A right to request the transfer of your data** to another provider. This right applies when the processing is based on your consent or the performance of a contract, and is performed using automated processes.

If you have any additional questions or would like to file a complaint about the processing of your Personal Data, you can contact CHINALUX. at the email address E-: privacy@china-lux.lu .

Finally, the GDPR provides you with the **right to lodge a complaint** with the supervisory authority. In Luxembourg the competent authority is the National Commission for the Protection of Data (*Commission Nationale pour la Protection des Données*) (<https://cnpd.public.lu/fr.html>).

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