



## Data Privacy Policy

As part of our ongoing commitment to data protection and transparency, Choice Technologies Lux S.à.r.l. (“**Choice Technologies**”) and other Choice Technologies affiliates (together “**Choice**”) addressed the new standards introduced by the General Data Protection Regulation (“**GDPR**”) in this Data Privacy Policy.

In this Data Privacy Policy, we cover the nature of the personal data that is collected and stored by us, the purpose and the legal basis for processing your data, the data sharing, the data retention and your rights with regards to your data as data subject.

In the context of our service offering, Choice mainly acts as data controller for the personal data we process for our own purposes such as described below.

### **PERSONAL DATA**

In accordance with the GDPR definitions, when we refer to “personal data” we mean any data that could identify an individual, directly or indirectly, in particular, by reference to an identifier such as a name, ID number, location data, signature or online identifier.

We respect the privacy of individuals and companies with regards to their personally identifiable data (“Personal Data”) and are committed to protecting the privacy of our customers & subscribers (“Users”). This privacy policy describes how your Personal Data is collected and used and informs your choices with respect to your Personal Data. The following discloses our information gathering and dissemination practices.

Choice collects personal data and will act as the data controller of this data if you:

- are a client or represent one of our clients (e.g. client which would like to benefit from our Revenue Intelligence Software)
- have a business relationship with us ( e.g. our business partners )
- are candidate for a position at Choice
- use our website
- visit us in our offices or register to attend an event organized by Choice

#### 1. Collection of personal data



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We collect your personal data during the course of your business relationship with us. For example, when you engage with us in respect of a new relationship/prospective relationship, you will communicate with your contacts within Choice.

We may also receive data about you from other sources, such as directly from your organization or via other publicly available sources.

We combine data about you from various sources, including the data that you have provided to us directly.

Choice only collects data that is necessary to fulfil the purpose behind our relationship with you. We won't collect data we don't need. Personal data we collect fall within one or more of the below categories:

- Identification and professional data (e.g. first name, last name, e-mail address, date of birth for candidate, postal address)
- Online identifiers (e.g. including IP addresses, cookie identifiers, online website tracking).
- Government issued identification numbers (e.g. national ID card, passport number, driver's license number for candidate)
- Communications (e.g. emails and meetings)
- Publicly available data: (e.g. data about you that is openly available on the internet/public statements)
- Electricity amount charged to our client's customer.

## 2. How we use your personal data

We will only process your personal data on the basis allowed in the GDPR, for the purposes below, and we will limit the use of sensitive data which have special legal protection.

## 3. Legal basis for processing your data

We will only collect, use and share your personal data where we are satisfied that we have an appropriate legal basis to do so.

Such legal basis may be one of the following:

- to fulfil a contract, we have with you or to take steps to enter into a contract with you
  - Customer relationship management,
  - to provide services,
- to improve our software and services, and verify the veracity of the calculated information,
- to respond to complaints and seek to resolve them
- to comply with a legal obligation
- to fulfill our legitimate interest



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- to develop new ways to meet our clients' needs and to grow our business, for example by seeking feedback or sharing our market research
  - to log and monitor use and abuse of our technical services
  - to understand how our clients, use products and service from us
  - to protect our IT systems, network and infrastructure
  - to run our business in an efficient and proper way, for example managing our financial position, building our business capability, or for planning, communications, corporate governance or audit
- or based on a consent that you have given us
- when you have provided data for use for certain marketing purposes

## **DATA SHARING AND TRANSFERRING PERSONAL DATA GLOBALLY**

Choice may share your data to manage our business and deliver services and/or to comply with applicable laws, regulations and rules.

Choice may transfer your personal data with:

- competent authorities (e.g. working to prevent fraud)
- service providers when it is necessary for the completion of any service requested or authorized by the customer, which are bound by a contractual agreement and have agreed to confidentiality restrictions being located in the EU or in a country providing an adequate level of data protection.

Should your personal data be processed in countries outside the EU or in countries not providing an adequate level of data protection, Choice will take appropriate steps to ensure that such processing will be executed in accordance with the below:

- transfers within Choice will be covered by an agreement to ensure that personal data receives an adequate and consistent level of protection wherever it is transferred within Choice
- where we transfer your personal data outside Choice, or to third parties who help provide our products and services, we obtain contractual commitments from them to protect your personal data by including standard contractual clauses as defined by the European Commission

## **SECURITY**

In addition, Choice Technology will take all necessary and reasonable technical and organizational measures to ensure a high level of security of the data processed and to protect them against accidental or unlawful destruction, accidental loss, alteration, loss or deterioration, unauthorized dissemination or access and any other form of unlawful processing.



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## DATA RETENTION

We will store your personal data for as long as it is necessary for the purposes for which it was collected, as explained in this Privacy Policy and in accordance with the GDPR.

## YOUR RIGHTS AS A DATA SUBJECT

You have a number of legal rights in relation to the personal data that we hold about you and you can exercise your rights by contacting us using the details at the back of this document. These rights include:

- the right to obtain data regarding the processing of your personal data and access to the personal data which we hold about you
- the right to withdraw your consent to our processing of your personal data at any time in circumstances where you have explicitly given your consent.
- the right to data portability via the receipt of some of your personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible.
- the right to request that we correct your personal data when your personal data is inaccurate or incomplete
- the right to request that we erase your personal data in certain circumstances
- the right to object to the processing of your personal data or the right to request that we restrict our processing of your personal data in certain circumstances

Please note that these rights are subject to certain conditions like legal obligations, retention period requirements especially where you ask us to restrict the use of your personal data or the erasure of such data.

Any complaint can be logged on the site “cnpd.lu” of the data protection regulator (National Commission for Data Protection located at 1, avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette), when he considers that his data is processed in a manner that does not comply with the RGPD.

As regards to this Privacy Policy, there is no need for you to take any action.

Should you have any question on the aforementioned or should you want to exercise one of the above rights, please contact: [privacy@choiceholding.com](mailto:privacy@choiceholding.com)