



Data protection policy

Documentary information

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History

Version	Date	Author	Modifications
0.1	23/12/2018	Mr Aubigny	Creation - Draft for discussion
0.2	31/12/2018	Mr. Schroeder	Modification - Draft for modification
1.0	07/01/2019	Mrs. Meyers	Validation - Final version for distribution
2.0	01/03/2022	Mr.Schroeder Mrs. Meyers	Modification - Draft + Validation

Privacy policy

In order to ensure that you are clearly informed about the processing of your personal data and that your data protection rights are respected, we have established a privacy policy for nr docusafe (netto-recycling S. à r.l.) that complies with the General Data Protection Regulation [EU Regulation 2016/679] and all relevant European and Luxembourg legislation.

Our privacy principles

As your privacy is important to us, we only process your data in accordance with the following principles :

- We will only use your personal data in a fair and trustworthy manner.
- You have the right to be clearly informed about how we use your personal data. We will always be transparent with you about what data we collect and how we use it.
- If you have any concerns about how we use your personal data, we will help you understand our processing.
- We will take all reasonable steps to protect your information from misuse and to keep it secure.
- We comply with all applicable data protection regulations and cooperate with the Luxembourg data protection authority (CNPD).

Collecting and using your data

Personal data is data that can be used to directly or indirectly identify or contact a person.

When you browse one of our websites, create an account to access one of our services, or contact us via a form or e-mail, we collect your personal information in order to provide you with the requested services or respond to your requests. Unless the information is required to fulfill a contract between you and us or a legal obligation, you remain free to provide us with the personal information we request, and we undertake to collect only the minimum required to process your request or provide you with the requested service.

If you no longer wish us to process your data, you can withdraw your consent at any time without any inconvenience by contacting the data controller at gdpr@nrdocusafe.lu or by unsubscribing from the service using the appropriate form.

Who takes care of your data

As the controller of the processing operations for which your information is collected, we are responsible for ensuring that your privacy rights are respected and, as such, we take care of your data.

To facilitate the management of your questions and requests, we have designated persons responsible for data protection for each processing operation. For any information concerning your personal data or questions about the way in which we process this data, you can contact them by e-mail at gdpr@nrdocusafe.lu.

What personal information do we collect?

- When you browse our website (www.nrdocusafe.lu) we collect your electronic identification data, your behavior, your historical searches, your choices in order to offer you a better experience on our website, especially the next time you visit.
- When you contact us by telephone, e-mail or via an online form on the www.nrdocusafe.lu website, or when you contact one of our staff directly, we collect your first and last name, e-mail address and telephone number, as well as any other information you may wish to pass on to us in the course of this communication.

How we use your personal data

- The personal information we collect allows us to provide the services you request from one of our three entities and the information related to these services, such as delivery of our products, quotations, to manage your complaints and your requests for information, as well as to provide you with any information you may require.
- In addition, if you create a user account, the information collected enables us to establish and manage your profile, your preferences and recommendations, and your history in order to improve the quality of our service.
- With your explicit consent, this information enables us to send you a newsletter about our company, its activities, special events, or to provide you with commercial offers.

Disclosure to third parties

Your personal data will not be disclosed to third parties unless you have expressly given your consent, or we are obliged to disclose it for example due to a court order or legal obligation.

In the event of a sale, merger or dissolution of our company, we may share your information with the new legal entity, provided that the purposes for which the information is to be processed remain the same, and in any event you will be informed of this in good time.

Transfer outside the European Union

We do not transfer any of your personal information to servers located outside the European Economic Area (EEA) or to a country that is not subject to the European Commission's standard contractual clauses. We use subcontractors who undertake to keep your data within the EEA or we ensure that processing activities are covered by a European Commission decision on privacy issues, in particular in the following case.

In any case, if the transfer is made to a third country or an international organization not covered by an adequacy decision taken by the European Commission, you will be informed before any processing so that you can exercise your right to object.

Protecting your data

We take reasonable steps to protect your personal information at all times. Where necessary, our online services protect your personal information in transit using an encryption protocol such as Transport Layer Security (TLS). When your personal data is stored, we use limited-access computer systems housed in facilities employing physical security measures. Where necessary, data will be stored in encrypted form, including when we use third-party storage. In addition, we have put in place strict measures to segregate access to your data in order to limit the risk of disclosure or corruption.

Our organization works with other companies, such as email and SMS providers, automatic information distribution services, Cloud service providers, specialized IT services. The selection of a third party follows a comprehensive selection process. In this selection process, each service provider is carefully selected on the basis of its technical and organizational data protection skills. A contract for the processing of personal data will only be concluded if it complies with the security requirements identified, including the specific requirements of European and national regulations for the services implemented.

Integrity and retention of personal data

We make it easy for you to keep your personal information accurate, complete and up-to-date. We do not keep your personal information longer than is necessary to provide you with the services you have requested or after 2 years of inactivity on your part, unless we need to keep it for legitimate legal reasons.

To protect this data from accidental or malicious destruction, when we remove it from our services, we may not immediately delete the remaining copies from our servers or backup systems. Complete destruction will occur after a full backup cycle.

Our commitment to your privacy

Access to your personal data is restricted in order to prevent unauthorized access, modification or misuse, and is authorized only for our employees or partners who need it for their mission, and always under cover of a confidentiality agreement.

Specific use of your data

Cookies and related technologies

Our websites use technologies such as "cookies" and other web tools to help us improve your experience and our services. These technologies allow us to better understand user behavior and tell us which pages of our websites are most visited or which features are most appreciated by our users. If these technologies are optional, we will ask for your consent to implement them. Even if some of these technologies are necessary to ensure communication or to provide you with our main services and as such do not explicitly require your consent, we will inform you of their use.

Most browsers are configured to accept cookies automatically. In general, you can prevent cookies from being stored on your hard disk by selecting "Do not accept cookies" in your browser settings. You can also configure your browser to ask for authorization before storing cookies. Finally, you can delete previously set cookies at any time. However, if you set your privacy settings as such, you may not be able to use the full functionality of our website.

Google analytics

Our website uses Google Analytics. ("Google") and enables us to improve our Internet presence. The information collected by means of a cookie (IP address, access time, access duration) is transmitted to Google servers in the USA and stored there. The evaluation of their activities on our website is transmitted to us in the form of reports or can be viewed on a protected site. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. However, to

avoid Google having any direct personal relationship with you, we use the "anonymous" function. This means that IP addresses are only processed in abbreviated form, and do not allow you to be located or an individual profile to be created by cross-referencing.

By using our website, you consent to the processing of data about you by Google in the manner set out above. If you wish to limit this processing, you can use certain browser extensions to deactivate and control Google Analytics tracking.

Marketing and advertising

In addition to providing our services, we also use your personal data to communicate with you about our marketing offers or promotions and to recommend other services that may be of interest to you. In particular, these offers contain references to new web offers and information in line with current processing purposes.

If you no longer wish to receive information or newsletters from us by e-mail, you can object at any time by contacting us or by using the link you will find in each of our e-mails or newsletters.

Your privacy rights and questions

Your rights

You have the right to :

- Receive a structured copy of the personal data we process.
- Ask us to correct, update or delete your personal data from our files.
- Notify us of any misuse of your personal data.
- Totally or partially withdraw your consent to the processing of personal data.

All you have to do is log on or send us an e-mail to gdpr@nrdocusafe.lu, clearly specifying the nature of your request so that we can respond as quickly as possible.

Questions about your rights

If you have any questions or concerns about our privacy policy or data processing, or if you believe that your personal data has not been processed in accordance with the law, please contact us at gdpr@nrdocusafe.lu. Where your question is of a more substantive nature, you may be asked for more information. If you are not satisfied with the response you receive, you may address your complaint to the national personal data protection authority CNPD (www.cnpd.lu or databreach@cnpd.lu).

We may change this Privacy Policy by posting an updated version of these rules on our website. We will give you reasonable notice of any material changes.