

Protection of personal data (December 2018 version)

1. Contact details:

This privacy policy (the **Data Protection Policy**) is communicated to you by:

The Automobile Club du Luxembourg, in its capacity as a data controller - the '**ACL**', or '**Us**'
Non-profit association
Luxembourg Registry of Commerce: F630

Data Protection Manager at the ACL:

Frank Ernst
54, Route de Longwy, L - 8080, Bertrange
(L - 8007 Bertrange)
Telephone: +352 45 00 45 4035
Fax: +352 45 04 55.
email: gdpr@acl.lu

The Data Protection Manager is the internal contact person at the ACL who is in charge of addressing your requests or questions concerning the protection of your personal data, if necessary with the assistance of the Data Protection Officer at the ACL.

Data Protection Officer:

ProNewTech S.A. (Mr. Fabio Milo)
55, Allée de la Poudrerie, L-1899 Kockelscheuer
Luxembourg
Téléphone: (+352) 32 99 20 1
Fax: (+352) 32 99 20 11
e-mail : dpo-acl@pronewtech.lu

The Data Protection Officer is an external adviser appointed by the ACL who is in charge in particular of monitoring compliance with the applicable data protection rules and acting as a contact point for the supervisory authorities and data subjects on all matters relating to the processing of personal data for which the ACL is responsible.

2. We process your Personal Data

When using certain features of this Website (hereinafter '**Website**'), e.g. contact forms, travel itinerary requests, subscribing to the newsletter, online ACL membership, applying for a job offer, registration for an event or training session, etc), the Automobile Club du Luxembourg (hereafter, the '**ACL**' or '**Us**') collects and processes, in its capacity as a data controller, data of a personal nature, e.g. your surname, first name, email address, telephone number and any other information about you that you provide to us) (the '**Personal Data**').

The purpose of this Privacy Policy is to inform you how we use the Personal Data that we have collected, or that are provided to us via the Website or contact form on the Website, and to inform you of your rights in this regard.

Exclusion:

This Data Protection Policy does not govern the processing of Personal Data in connection with the sale of products or the provision of services by the ACL and/or the companies belonging to its group ('**ACL Group**') or its partners, i.e. online purchases, vehicle rental or ACL membership and availing of services offered by the ACL Group and its partners, i.e. booking organised trips online or using the breakdown service. These services are subject to specific terms and conditions available from the ACL Group.

3. We process your Personal Data lawfully

We process your Personal Data in accordance with the applicable laws and regulations governing the protection of personal data (including the amended law of 2 August 2002 on the protection of individuals with regard to the processing of personal data and, in particular from 25 May 2018 onwards, Regulation (EU) 2016/679 of 27 April 2016 on the protection of individuals in respect of the processing of personal data and the free movement of such data - hereinafter the '**Data Protection Act**').

We will process your Personal Data when necessary:

(i) for the performance of a contract to which you are a party to or pre-contractual measures taken upon your request, i.e. when you apply to become a member of the ACL or are already a member of the ACL and wish to avail of services offered by the ACL and/or its group of companies ('**ACL Group**') in respect of which you must enter your membership number in the forms on our Website with these benefits being subject to specific conditions of service available from the ACL Group;

(ii) to safeguard **our legitimate interests**, which mainly consist of performing or facilitating a variety of motoring-related initiatives relating to road traffic, mobility, road safety, tourism, presenting the services of the ACL Group, event invitations and marketing initiatives both among ACL members and non-members in connection with the promotion of motor sport, our various tourism offers and any activity directly or indirectly related to motoring, mobility and tourism;

(iii) to comply with all legal and regulatory obligations in respect of which we are liable.

(iv) on the basis of your consent, as described below:

When you provide us with your Personal Data via the forms provided for this purpose on the Website, e.g. subscribing to the newsletter, getting in touch with us via the contact form, applying for a job offer, requesting an itinerary, becoming a member, registering for an event or training course, registering for a trip, etc, we regard you as having consented to the processing of Personal Data that

you submitted to us via these forms or by other means of communication following your use of these forms, e.g. when you communicate with us by email via the contact form our Website.

4. What kind of Personal Data do we process?

The Personal Data we collect and process includes - depending on your request - your name, first name, address, email address, telephone number, date and place of birth, nationality, age, gender, social security number or national identification number. In the case of a request for an itinerary, it includes your place of departure and destination. In the event of a contact request, it includes your various questions and requests. In the case of a job application, it comprises your CV and cover letter as well as all the information contained in these documents, i.e. academic background and training, previous employers, professional qualifications and skills, interests, etc, and any other information you may have provided us with. When the forms provided on the Website contain mandatory fields in which you must provide your details, we process this Personal Data to the extent necessary to respond to your requests and for the purposes of our legitimate interests which consist of identifying the persons who contact us and, in this way, ensuring that their various requests are addressed and followed-up.

When you provide us with your Personal Data, you agree to provide us with accurate, complete and up-to-date information.

We will not ask you for specific categories of personal data about you (the '**Sensitive Data**'). Sensitive Data concerns your racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, health, sexuality or sexual orientation. Therefore, if such data is included in documents and/or information that you provide to us on your own initiative, we will consider that you expressly consent to such Sensitive Data being stored on our servers if we do not have effective tools or measures to delete them.

5. Why we process your Personal Data?

We process your Personal Data only to the extent that it is necessary to the purposes for which we collect them. These purposes may vary according to the reasons in respect of which you communicate your Personal Data to Us. We may therefore process your Personal Data in order to:

- (i) answer all your requests for information or any other questions on your part, handle any complaints or claims you may have as well as, if applicable, to provide you with the services you have requested;
- (ii) manage your application and recruitment when you apply for a job offer; and
- (iii) safeguard our legitimate interests as described above (see **point 3 (ii)**) and hereafter and in particular to present you with our various service offers and invite you to social events which match your interests.

We may also process connection data, such as your IP address and the date and time of your visit, informing us about visits to our Website in order for us to perform analyses and statistics regarding traffic on our Website.

We also produce statistics in order to adapt our services to your needs. These statistics are based on all the interactions you may have had with the ACL. However, this information is anonymised beforehand in these statistics in order to guarantee your anonymity.

Where the ACL Newsletter is concerned, your reaction to the messages you receive from the ACL (e.g. the number of clicks on the same link and/or the number of single clicks on different links, pages visited, date and time of consultation, language chosen, open links) is also recorded in order to offer you more attractive and pleasing news, or to register your choice to unsubscribe from the Newsletter if you so wish. This information is linked to your ACL member profile (if you are an ACL member) and is used only to rework the format of our Newsletters. We do not use this information to provide you with personalised campaigns.

In the context of the sale of products and/or services of the ACL Group, your Personal Data collected on this occasion will be processed for other purposes specific to the sale of these products and/or services, which are subject to specific general conditions available from the ACL Group.

6. You may withdraw your consent to the processing of your Personal Data

In cases where your Personal Data will be collected on the basis of your consent, e.g. when you voluntarily submit your Personal Data via a Website form that is not a required field, you have the right to withdraw your consent for this data to be processed at any time in accordance with the Data Protection Act. If you withdraw your consent for your Personal Data to be processed, we will stop processing your Personal Data from the date of withdrawal. Consequently, we may no longer be able to answer your requests for information in relation to which we are obliged to process your Personal Data. To withdraw your consent, you may use the contact form provided on the Website or the means of communication referred to at the beginning of this Data Protection Policy.

7. How and where is your Personal Data stored?

The Personal Data we collect through our Website will be stored on servers located in a data centre in Europe, operated by our IT service provider, Computerland SLM S.A. Rue de Sanem 47A L-4485 Soleuvre (www.computerland.lu). Your Personal Data will be kept for as long as necessary to process and follow up various requests, including your requests for information and advice, your subscription to the newsletter and the communication of information related to the interests you have selected, and the management of any job applications you submitted via our Website. The storage of data is limited to the strict minimum necessary based on the purpose.

8. Where your Personal Data is transferred

When you subscribe to our newsletter, we integrate your Personal Data into a software tool hosted on a cloud platform whose servers are located in Europe and which is made available to us by one of our external service providers. We use this software tool to host your contact details entered in our registration form (email, surname, first name, chosen language and, if applicable, your membership number) and to generate and send you electronic communications (email) related to the interests you selected when you registered for our newsletter.

9. What are your rights regarding the processing of your Personal Data?

In accordance with the provisions and limitations of the Data Protection Act, you have the right to ask us:

- (i)** access the Personal Data we process about you, i.e. to obtain confirmation from us as to whether or not we have processed Personal Data about you and, if so, access to your Personal Data and receive copies of the Personal Data we process, as well as any other relevant information regarding the collection, use, storage and sharing of your Personal Data;
- (ii)** rectify your Personal Data as soon as possible when they are inaccurate or, taking into account the purposes for which we process them, complete them when they are incomplete, including by making subsequent requests for information;
- (iii)** delete your Personal Data as soon as possible. You may request the deletion of your Personal Data when we no longer need it or, when you wish to withdraw your consent or object to their use or, when we have unlawfully collected and/or processed them or, when they must be deleted to comply with a legal obligation;
- (iv)** limit the processing of your Personal Data, i.e. the tagging of some of your Personal Data that we store, in order to limit the cases in which we can use them afterwards. When you dispute the accuracy of your Personal Data, or when they are processed unlawfully but you do not wish to delete them or, when we no longer need such Personal Data, but they are necessary for you to establish, the exercise or defence of legal rights or, in the event that you have objected to them being processed, you may request that the processing of your Personal Data be limited for the time necessary for us to verify whether your objection prevails over our legitimate interests in processing such Personal Data;
- (v)** to enable you to object at any time to our use of your Personal Data, for reasons relating to your particular circumstances. You can object to the processing of your Personal Data only when this Personal Data is used for our legitimate interests or for prospecting purposes. You may not therefore object to the processing of your Personal Data when you have given us your consent to such use or when they are required by us for the performance of a contract. When you object to the use of your Personal Data, we may no longer use them, unless we can demonstrate that there are legitimate and compelling reasons for processing your Personal Data that prevail over your interests and your rights and freedoms, or for establishing, exercising or defending legal rights;
- (vi)** the portability of your Personal Data. The right to portability allows you to receive the Personal Data that you yourself have provided to us, in a structured, commonly used and machine-readable format, and to transmit your Personal Data or, if technically possible, have us transmit the Personal Data to another data controller. You may exercise your right to the portability of your Personal Data only when we use this Personal Data on the basis of your consent, or to perform a contract, and this Personal Data is processed using automated methods.

You may exercise your rights as listed above or send us all your questions concerning the processing of your Personal Data by contacting Us directly via the contact form provided on the Website

(<https://www.acl.lu/Contacts/Contact>) or by using the means of communication referred to at the beginning of this Data Protection Policy or by following the instructions you receive in the various communications we send you.

10. Cookies

A cookie is a small text file placed on your internet browser (Safari, Firefox, Google Chrome, Internet Explorer, etc) when you access our Website. First of all, cookies make it possible to transmit information between our Website and your computer/smartphone/other electronic device so that you can access and browse this Website via the world wide web. Cookies also allow us to recognise your language preferences set during a previous visit and to compile anonymous statistics about visits to our Website. A cookie itself does not contain or collect information. However, when 'read' by our server in conjunction with your browser, it can provide us with information that help us provide a more user-friendly service, e.g. by storing details of your user account, such as your preferred language or your most recent searches.

Cookies are stored in your browser memory and usually contain:

- the name of the server from which the cookie was sent;
- the lifetime of the cookie;
- a value (usually a unique number chosen at random).

Our server uses the random number contained in a cookie to recognise you when you return to our Website.

Your acceptance of cookies

When you access the Website, a notice banner informs you that this Website stores and uses cookies on your browser. Cookies will be placed on your web browser based on your browser's cookie settings. If you continue to browse our Website without having configured your browser's cookie settings to reject cookies, we will assume that you have consented to the storage and use of cookies on your browser. Once cookies have been placed on your web browser, you will no longer see this notice banner if you access our Website again using the same web browser, unless these cookies have been expired or deleted from your web browser.

Rejecting cookies

If you do not want cookies or certain types of cookies to be placed on your browser by our Website, you must adjust your browser settings according to your preferences. The settings of most web browsers allow you to accept, reject and delete cookies or certain types of cookies or cookies from certain domains as well as to verify cookie information placed on your web browser such as their origin, lifetime and content.

Blocking or deleting certain cookies from your browser may affect the proper functioning of our Website or prevent you from taking advantage of all the features provided to enhance your browsing experience. We waive any liability in the event of disruption or disturbance to, or the malfunctioning of our Website caused by your browser being configured to reject cookies or if you deleted cookies that are necessary for the optimal functioning of the Website.

Types of cookies we use

Language preference

We use a cookie that allows our Website to remember your language preference when you return to our Website after selecting your preferred language.

Session cookie

A session cookie is used to store and retrieve data regarding your visit. The information stored on our server is retained and only the unique username stored in the cookie will be communicated between your internet browser and our server.

Third-party cookies

Google Analytics

We use Google Analytics to analyse traffic on our Website. Google Analytics places cookies on your web browser and collects information from these cookies to generate and provide us with statistical information, reports and other information regarding visitors' interactions with our Website. Google Analytics also stores and processes this information. For more information about the data processing performed by Google Analytics, please visit:

<https://support.google.com/analytics/answer/6004245?hl=fr>

AddThis

We also use AddThis, a tool made available by Oracle to allow you to share, track, view, recommend and interact with the Website content. This tool allows social networking platforms (LinkedIn, Facebook, Twitter, YouTube) to place cookies on your Internet browser and access them when you interact with these platforms via the modules placed on our Website for this purpose. These cookies are able to identify you and match your preferences with your user account on these platforms. These cookies also allow the platforms concerned to monitor your activity on the internet for targeted advertising, analysis or market research purposes. These cookies are controlled by the relevant social networking platforms and as such are subject to their privacy policies. The ACL has no control over these cookies and assumes no responsibility for their use.

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