

# GDPR

## POLICY OF CONFIDENTIALITY - CHARTER PRIVATE LIFE

The XATICO GROUP Sàrl company

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In the normal course of its professional activity, XATICO GROUP Sàrl AG collects personal data (such as defined below), which also includes the Personal Data of people navigating on its web site. The xatico.com site is accommodated with the servers of the company [www.networkers.lu](http://www.networkers.lu), Data Processor according to the regulation.

XATICO GROUP Sàrl's "Privacy Policy of Personal Data" of the company XATICO GROUP Sàrl is based on the General Data Protection Regulation (GDPR) Nr. (EU) 2016/679 of April 27th, 2016, fully applicable as from May 25th, 2018, and also to any Luxembourg regulation aiming the protection of Personal Data.

The object of the present "Charter of private life", or "Privacy Policy", is to inform all concerned natural persons, hereinafter mentioned as "You", or "Your / your", about the way XATICO GROUP Sàrl collects and processes Personal Data and on the rights that the concerned natural person has to control the use of these Personal Data.

### 1. SCOPE OF THE PRESENT CHARTER OF THE PRIVATE LIFE

The present Charter expresses the principles and the guidelines for the protection of your personal data, which includes the personal data collected also on - or via - the website [www.xatico.com](http://www.xatico.com). The notion of personal data (the "Personal data") is established by any information which relates for one-person physical appearance, which it is identified, to see simply recognizable and even indirectly (ID number or a cross-checking of information).

Some examples of personal data: identity, address and phone number, number identifying, given by location, information concerning professional life, IP address, etc.

The "not Personal Data" correspond to information not allowing the identification of any natural person.

The use of the web site [www.xatico.com](http://www.xatico.com) as well as the personal data which you will agree to communicate on this web site are subjected to the present Charter.

### 2. COLLECTED DATA

By visiting and by using the [www.xatico.com](http://www.xatico.com) web site, you agree expressly that the person in charge of the treatment collects and processes your Personal Data. This can include:

First name and name;

Mailing address;

E-mail address;

Number (s) of telephone;

Login and password;

Name of the company;

VAT number;

Activity sector typechap of organization - company, school, etc.);

IP address;

Etc, incl. any other Personal Data possibly relevant to the expressed below purposes.

The person in charge of collecting and processing shall also intervene on data without any personal character, thanks to the fact they do not allow to directly or indirectly identify a natural person. If ever data with no personal character would be combined with personal data, so that an identification of the concerned natural people would be possible, the whole data would be considered as Personal Data.

### 3. PROTECTION OF MINOR PERSONAL DATA

The Personal Data collecting and processing is valid as from the age of the concerned natural person is at least 16.

No product or service of XATICO GROUP Sàrl shall be used by children.

However, if any relative discovers that a minor has communicated Personal Data with XATICO GROUP Sàrl without his/her/their consent, he/she/they can request to XATICO GROUP Sàrl to delete this personal information by sending an e-mail in [rgpd@xatico.com](mailto:rgpd@xatico.com).

### 4. METHODS OF COLLECTION

The person in charge of the processing collects the personal data via:

the registration form in the newsletter of XATICO GROUP Sàrl

the form of contact

the request form of estimate

the use of cookies

### 5. PERSONAL PURPOSES OF THE DATA COLLECTION

The Personal Data are collected and handled only in the only purposes mentioned below and exclusively on basis of your explicit acceptance:

ensuring the management and the control of the execution of the proposed services;

sending information on the activities of XATICO GROUP Sàrl;

sending information on the services of XATICO GROUP Sàrl;

sending, possibly, a range of services on preferential conditions;

answering questions;

realizing statistics;

improving the quality of the Web site of XATICO GROUP Sàrl and products and/or departments;

with the aim of action of direct marketing, allowing a better identification of Your centres of interest.

## 6. SHELF LIFE

The person in charge of the collecting and of the processing preserves the Personal Data only during the reasonably necessary time for the pursued purposes and in agreement with all legal and statutory requirements.

The Personal Data of a Customer are stored for max. 10 years after the end of the contractual relation, according to the legal obligations, which connects this customer to the person in charge of the processing.

The Personal Data of a Prospect having given its express consent are preserved for max. 3 years after the consent.

Shorter deadlines of preservation apply for certain categories of data, as the data.

In the term of the flow of the period of preservation, the person in charge of the collecting and of the processing makes every effort to make sure that the Personal Data were well made unavailable.

## 7. TRANSFER OF PERSONAL DATA

In case of access to our website from a non-member State of the European Union, we make you aware on the fact that the local legislation on data protection should differ from those of the European Union, and that you agree transfer your Personal Data through foreign jurisdictions.

## 8. COOKIES

The Site makes use of cookies to distinguish the users of the Site from each other. It allows us to supply You a good experience when You navigate through the Site and to improve it. To obtain more detailed information on the cookies we use, and the targets for which we use them, we refer you to our Policy of cookies.

## 9. CONDITIONS OF TREATMENT AND STORAGE OF THE PERSONAL DATA

The "treatment" of the Personal Data includes among others the use, the preservation, the recording, the analysis, the declaration and the destruction of the Personal Data according to what is necessary under business circumstances.

The from us collected information is only of use to internal purposes and won't be forwarded to others natural or legal persons, bound or not to our company, except (i) for outsourcing, being precised that according to GDPR, our subcontractors have the same duties towards You than we have and except (ii) if these Data would be requested by judicial authorities or police services, without the prior authorization of their holder.

We set up security measures suited to protect the loss, the misuse or the change of the information received on our site.

All our employees having access to your data have a strong duty of strict confidentiality.

According to the law, You have at any time the right to access and to make rectification to these data as well as the right to oppose, to verify their accuracy and TO correct the possible errors concerning them.

All the collected Personal data are preserved for duration limited according to the purpose of the processing and only for duration planned by the applicable legislation.

## 10. LINKS TOWARDS UNCHECKED WEB SITES BY XATICO GROUP Sàrl

Our site proposes you links towards the sites which could interest You.

XATICO GROUP Sàrl exercises no control over the contents of sites of third parties or over the practices of these third parties regarding Personal Data protection which they could collect. As a consequence, XATICO GROUP Sàrl declines any responsibility concerning the treatment by these third parties of your Personal Data. It is on your responsibility to inform You on how the Personal Data are protected by these third parties.

## 11. RIGHTS OF THE CONCERNED PERSON

In accordance with the European regulation on the protection of Personal Data, you are an owner of your data and you have rights on Your Personal data which are:

right to access the information,

right to rectification: if Your Personal Data are incorrect or incomplete, you have the right to ask us to rectify it by contacting us on: [rgpd@xatico.com](mailto:rgpd@xatico.com)

right to object the processing: You can object using your Personal Data for its own legitimate interests. We will consider your objection and whether processing your information has any undue impact on you that requires us to stop doing so. You can also object to receiving personalised commercial messages from us.

right to restrict the data processing. If You wish to oppose the use of your data for purposes of direct marketing (newsletter), you can send an e-mail in [rgpd@xatico.com](mailto:rgpd@xatico.com) or via the link of deregistration below the newsletter.

right to make the Data disappear (or "straight ahead in the oversight") - You can remove your consent at any time or Your Personal data can be deleted if you make the request if Your data are obsolete or non

-relevant. You can send an e-mail in [rgpd@xatico.com](mailto:rgpd@xatico.com)

right to data portability: you can ask XATICO GROUP Sàrl that Your data are passed on to you in a "structured format, usually used and visible on machine"

## 12. SAFETY (SECURITY) AND ADDRESSEES OF THE DATA

XATICO GROUP Sàrl ensures to protect the Personal data that You chose to communicate with it, to make them confidential and to prevent the leak, the loss, the theft, the destruction of the data (accidental or further to an unauthorized intrusion into the computer system of XATICO GROUP Sàrl).

All the Personal Data you communicate are confidential, their access is limited to the person in charge of the collecting and of the processing of XATICO GROUP Sàrl which needs it within the framework of the execution of its mission. All the people having access to Your Personal data are bound by a special obligation of confidentiality.

However, although we take these measures to ensure the security of your information, you must be aware of numerous risks connected to the information security and to take the precautions suited to help you to protect your information (password and information appearing in Your space).

## 13. RESOLUTION OF THE CONFLICTS

Although reasonable measures are taken by XATICO GROUP Sàrl concerning the protection of Personal Data, no technology of transmission or storage shall be considered as completely infallible.

If you have doubts as for the security of Your Personal Data or if there has obviously been a "bad" use of these Personal Data, you are invited to contact XATICO GROUP Sàrl at the following address: [rgpd@xatico.com](mailto:rgpd@xatico.com)

XATICO GROUP Sàrl will answer to the complaints concerning the use and the disclosure of Personal Data and will do its best efforts to solve them according to the principles appearing in the present Charter of Private Life and according to the applicable European and Luxembourg regulation.



#### 14. CONTACT

For any request concerning your Personal Data: access/consultation, rectification, erasure, limitation of the treatment, portability, opposition or for any complaints, you can send an e-mail to the following e-mail address: [rgpd@xatico.com](mailto:rgpd@xatico.com)

#### 15. EFFECTIVE DATE AND PERSONAL REVISIONS OF THE DATA PROTECTION POLICY

The present Personal Charter of Private life of Data protection is effective since 22-05-2018.