

## Privacy Policy related to Personal Data Protection

If you are my client, you receive feeds/newsletters or you visit my website, you entrust me your personal data and I am ensuring their protection. Please find below description of the personal data protection principles including the list of rights that you have according to the GDPR (general data protection regulation<sup>1</sup>).

### Who is the data controller?

I am Eva Rohde, an independent entrepreneur, exercising under Business Permit No 10015604/0, registered in the Luxembourg Business Register under No A42103, operating a web site <https://erz.lu>. I process your personal data as a controller; that is, I determine how your personal data will be processed, for what purpose, for how long, and I select further processors who will help me with processing the data.

### Contact

If you want to contact me during the period of processing your data, please do so by phone (+352 621 643 188) or by e-mail ([eva@erz.lu](mailto:eva@erz.lu)).

### Declaration

I declare that as a controller processing your personal data I comply with all legal obligations required by the legislation currently in force, in particular by the GDPR and by the data protection law (law establishing the National Commission for Data Protection and the implementation of GDPR<sup>2</sup>). Namely,

- I will process your personal data only on the basis of a valid legal ground, and in particular on the basis of a legitimate interest, in order to perform a contract, on the basis of a legal obligation or on the basis of a given consent,
- I fulfill my obligation to inform (under Article No 13 GDPR) prior to processing the personal data,
- I will support you in using and obtaining your rights stated in the data protection law and in the GDPR.

---

<sup>1</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 (Official Journal of the European Union, L 119/1, 4.5.2016.)

<sup>2</sup> Law of 1 August 2018 establishing the National Commission for Data Protection and the implementation of GDPR (Loi du 1er août 2018 portant organisation de la Commission nationale pour la protection des données et mise en oeuvre du règlement (UE) 2016/679 du Parlement européen et du Conseil du 27 avril 2016 relatif à la protection des personnes physiques à l'égard du traitement des données à caractère personnel et à la libre circulation de ces données, et abrogeant la directive 95/46/CE (règlement général sur la protection des données), portant modification du Code du travail et de la loi modifiée du 25 mars 2015 fixant le régime des traitements et les conditions et modalités d'avancement des fonctionnaires de l'État.) Official Journal of the Grand-Duchy of Luxembourg.

## **Extent of the personal data and purposes of the processing**

I process the personal data entrusted to me by you for the following purposes:

- providing services, performance of a contract: your personal data (e-mail) is necessary performing a contract (e.g. in order to send you your access identifiers to an application, to send you online course lectures etc.),
- accounting: if you are my clients, I need your personal data (data necessary for establishing invoices) in order to comply with the legal obligations related to the accounting and tax laws,
- marketing – sending newsletters (feeds): I use your personal data (e-mail, name), sex, what links you click on in the email and at what time for purposes of the direct marketing – for purposes of sending commercial information. If you are my client, I do so on the basis of my legitimate interest because I have reason to assume that my newsletters/feeds interest you, for a period of 5 years from the date of the last invoice. If you are not my client, I send you my newsletters only on the basis of your consent, for a period of 5 years from receiving this consent. In both cases, you can withdraw your consent by clicking on “unsubscribe” link in any of my emails.
- advanced marketing on the basis of a consent: Only on the basis of your consent I can send to you also inspiring offers of third parties or use your e-mail address for example for a re-marketing and a targeted advertisements on Facebook, all this for a period of 5 years from receiving your consent. I keep your personal data for the time of the preclusion periods, unless a longer period is stated by law or explicitly stated by me.

## **Cookies**

When you read my website, I track your IP address, how long you stay and from which website you arrive. I consider using cookies as my legitimate interest (as a controller) for measuring the visits of my website because I believe that thanks to this information I can offer you even better services.

Cookies used for targeted advertisements will be processed only on the basis of your consent.

My website is readable also in the mode that prevents collecting personal data. You can forbid the use of cookies on your computer.

## **Ensuring compliance and personal data protection**

I protect personal data in the maximum possible extent by using modern technologies that correspond to the level of technological development. I protect them as if they were my own. I have adopted and I maintain appropriate technical and organisation measures that prevent misuse, damage or destruction of your personal data.

## **Transmitting personal data to third parties**

My coworkers have access to your personal data.

In order to ensure specific processing operations that I cannot ensure myself, I use services and applications of the processors capable to protect the data better than me and who are specialised for such processing. It is the providers of the following platforms:

Facebook

Google

It is possible that in the future I will opt for other applications or processors for purposes of processing the data in a simpler way or with a better quality. I promise you that I will select these processors carefully, requiring from them the maximum compliance and the quality of processing.

## **Transmitting personal data out of the European union**

All processing of the personal data will be done within the territory of the European union.

## **Your rights related to the personal data protection**

You have the following rights in relation to the personal data protection; should you wish to use some of these rights, please contact me by e-mail ([eva@erz.lu](mailto:eva@erz.lu)):

- **Right to be informed:** this right has been fulfilled by the existence of this document of Privacy Policy related to Personal Data Protection;
- **Right to access:** on the basis of this right you can request from me the information how and for what purpose I process your personal data; I will provide you with an answer within a 30-day period;
- **Right to rectify any inaccurate and incomplete personal data:** should anything change on your side or should you conclude that your personal data is out-of-date or incomplete;
- **Right to restrict the processing of your personal data:** you can use this right if you contest the accuracy or legality of processing your personal data, while you do not wish to delete the data, or if you object to the processing of your personal data. You can limit either the extent of the personal data or the purpose of processing. (e.g. by unsubscribing from the newsletter you limit the purpose of processing your personal data and I can no longer send you commercial information.)
- **Right to receive your personal data in an interoperable format, or have it directly transmitted to another organisation:** if you want to have your personal data transmitted to another entity, I will proceed the same way as if you used your right to access — with the difference that the information will be sent to you in a machine-readable format. I will provide you with an answer within a 30-day period;
- **Right to erase your personal data (“right to be forgotten”):** I do not want to forget you but if you wish so, it is your right. In such case, I will erase from my system, as well as from all the systems of the partial processors, as well as from the backup, all your personal data. I will comply with your request within a 10-day period.  
In certain cases I am bound by other regulatory requirements. For example, I need to keep a record of certain documents for purposes of accounting and tax declaration and I need to keep such documents for a period stated by a respective law. In these cases I will erase all personal data not covered by the law. I will inform you about erasing your data by e-mail.
- **Right to lodge a complaint with the Luxembourg Data Protection Authority (Commission Nationale pour la Protection des Données):** if you consider that I do not process your data in compliance with respective laws, you can submit a complaint with the Luxembourg Data Protection Authority. I will be glad if you inform me before doing such step, so that I can rectify my action.
- **Right to unsubscribe from newsletters and commercial information:** I am sending you inspirational e-mails, articles, e-mails presenting my products and services, if you are my client, on the basis of my legitimate interest. If you are not yet my client, I am sending them to you on the basis of your consent. In both cases you can unsubscribe from receiving these e-mails by clicking on a respective link in any of my e-mails.

**Obligation of secrecy**

I ensure you that me and my coworkers who will process your personal data are subject to an obligation of professional secrecy about the personal data and security measures of which disclosure would impair the security of your personal data. This obligation of secrecy applies also after the end of validity of the contractual commitments. Without your consent, your personal data will not be disclosed to any third party.

These Principles on Personal Data Protection apply as of 1 April 2021.