



GENERAL DATA PROTECTION REGULATION PRIVACY NOTICE

Effective as of: 25/05/2018

GENERALITIES

At MC Square, we care about your privacy and value the trust you place in us when you share your personal information.

Accordingly, we wanted to let you know how we deal with the personal information you give us or is given to us by a third party. The aim of this Notice is to explain to you - as Data Subject - what kind of personal information we gather on you, why and how we process it as data controller. This Notice sets out your rights with regard to the EU GDPR (General Data Protection Regulation).

This notice might be subject to changes. Any updates will be posted on our website. We recommend you regularly review it to ensure that you are always aware of our privacy practices. Our privacy commitments to you:

- We will keep your data safe and private
- We will ensure that you can exercise your rights
- We will train our employees to properly manage your personal information

WHO IS CONCERNED?

This Notice describes our practices when using:

- The personal information of natural persons which are clients based in the EEA¹ or outside the EEA;
- The personal information of any other data subject which operates as an employee, a legal representative, a supplier, a partner, a proxy, an administrator, a guarantor or a contact person.
- The personal information of natural person based in the EEA who may visit our Website.

WHAT PERSONAL INFORMATION ARE WE COLLECTING AND WHY?

In general, we may collect the following types of personal information you give us or which are given to us by third parties:

- Name;
- Nationality;
- Birth Date;
- Passport information;
- Profession, job title and position
- Tax identification number;
- “Politically Exposed Person” status, criminal convictions;

General Data Protection Regulation requires that we undertake to process only the data necessary for the purpose pursued by the processing.

More specifically, we use your personal data for the following purposes:

- To fulfill the contract to which you are party, or as part of the pre-contractual measures of such contract;
- To comply with legal and regulatory requirements;
- To pursue our legitimate interest as far as it is not overridden by your fundamental rights and freedoms;
- For any additional purpose for which you have explicitly consented to.

¹ European Economic Area

WHAT ARE YOUR RIGHTS?

Individuals have the following rights, under certain circumstances, in relation to their personal information:

- Right to access personal information
- Right to rectify personal information
- Right to restrict the use of personal information
- Right to request that personal information is erased
- Right to object to processing of personal information
- Right to data portability (in certain specific circumstances)
- Right to withdraw for consent for data processing (if the consent was required for lawful processing)
- Right to lodge a complaint with a supervisory authority.

If you - as an individual - wish to exercise these rights, you can contact MC Square at the following address:

MC Square

94, rue du Kiem

L-1857 Luxembourg

Tél : (+352) 26 92 70 34 61

Email : info@mcsquare.lu

We may ask for additional information to verify your identity before carrying out a request.

DATA TRANSFER

MC Square may transmit personal data to its service providers, suppliers and intermediaries in connection with the management of contracts.

Your data can be transmitted to public authorities, regulatory authorities, courts when required by law.

We only transmit your data for commercial use with your prior consent.

RETENTION PERIODS

We will retain your personal information covered by this Notice for as long as required to perform the purposes for which the data was collected, depending on the legal basis on which that data was obtained and/or whether additional legal/regulatory obligations mandate that we retain the personal information. In general terms, this will mean that personal information will be kept for the duration of our relationship and:

- the period required by tax, company and financial services laws and regulations, especially AML/CFT regulations; and
- as long as it is necessary for individuals to be able to bring a claim against us and for us to be able to defend ourselves against any legal claims. This will generally be the length of the relationship plus the length of any applicable statutory limitation period under applicable law.

CONFIDENTIALITY AND SECURITY

We have implemented reasonable technical and organisational measures designed to secure personal information from accidental loss and unauthorised access, use, alteration or disclosure.

HOW TO CONTACT US?

If you would like to raise any questions, concerns or complaints concerning this Notice, you can contact us at:

MC Square

94, rue du Kiem

L-1857 Luxembourg

Tél : (+352) 26 92 70 34 61

Email : info@mcsquare.lu

You can also lodge a complaint with the supervisory authority: the Commission Nationale pour la Protection des Données (CNPD) 1, avenue du Rock'n'Roll L-4361 Esch-sur-Alzette.