

## **PRIVACY NOTICE**

This document describes the conditions under which CLAW - Avocats à la Cour, established at 24 rue Jean l'Aveugle L-1148 Luxembourg (**we** or **CLAW**), collects and processes personal data (the **data**) pertaining to its actual, prospective or former customers (or contact persons or representatives thereof) and other individuals with whom CLAW is in business (**you**), including while visiting the CLAW website (the **Website**).

### **WHAT PERSONAL DATA DOES CLAW PROCESS ?**

We do not process data other than the data you have communicated to us (e.g., contact and business details), except data on customers we may collect or generate independently as required for compliance with applicable law (in particular for KyC/AMLFT or accounting purposes).

### **FOR WHAT PURPOSES DO WE PROCESS DATA**

We process data for the following purposes:

- communicate with you and provide you with the services, advice or assistance you have requested (as necessary to perform contracts/mandates with you or take steps at your request prior to entering into a contract/mandate);
- for billing, invoicing and accounting, as well as compliance with applicable ethical rules, KyC/AMLFT and tax law (as necessary for compliance with legal obligations to which we are subject);
- defend our interests before the Council of the Bar or courts in the event of any dispute (as necessary to defend our legitimate interests);
- keep you informed of events we organise, our publications or provide you with information we deem of interest to you (as necessary for our legitimate interests).

### **FOR HOW LONG DO WE RETAIN YOUR DATA?**

If you are a customer, we will retain your personal data for as long as required to deliver the services you have requested, and then for the mandatory retention duration set forth by applicable law (typically 10 years starting at the end of the financial year on which we have ceased to have business relations with you).

If you are a prospect or business relation, we will keep your data until our relation expires, or until you exercise your statutory rights as detailed below.

### **WHO ARE THE DATA RECIPIENTS?**

Your data is processed internally by duly authorized persons, within the limits of their respective competence.

Always subject to our applicable professional secrecy and ethical rules, data may also be communicated to the following third-parties:

- Council of the Bar in the event if any dispute;
- competent administrative and judicial authorities as required or allowed by law;
- our providers (including fiduciaries and IT service providers hosting the data) to the strictest extent necessary and subject to technical or contractual guarantees to ensure the security and confidentiality of the data.

We do not send data outside of the EU/EEA, save as (i) strictly necessary to perform our

contract/mandate with you, or (ii) defend, establish, exercise or defend legal claims.

## **WHAT ARE YOUR RIGHTS?**

You have certain rights concerning your personal as mentioned below, and can exercise them by contacting us at *info@claw.lu*.

- Access right: you have the right to access your data; note that, in accordance with applicable law and before the information is delivered, we may request you to specify the information or processing activities to which your request relates.
- Right to rectification: you can ask us to rectify, correct or update inaccurate and/or incorrect data.
- Other rights: in certain limited cases (in which case we will first analyse whether the conditions for the exercise of such rights are fulfilled, in line with applicable law), you may object to, or request the limitation of, the processing of your data, or request the erasure or portability of your data.
- You can contact the Luxembourg data protection authority (Commission nationale pour la protection des données) to introduce a claim.

## **COOKIES**

We do not use cookies on our Website. It cannot be excluded that hosting providers or third parties place cookies when you visit our Website; in such case, this is done independently from us and we have no knowledge or impact thereon.