

Privacy Policy ACSe

ACSe finds the protection of your privacy very important. Consequently, we strive to process your personal data in a legal, honest and transparent manner.

The current Privacy Policy concerns all personal data collected and processed by ACSe, with registered office at 47, Route d'Arlon L-8009 Luxembourg.

In this Privacy Policy, we explain which information we collect about you, what we use that information for and who we pass this information on to. This Privacy Policy also explains the rights you have and how you can exercise them.

1) Who do we collect personal data on

ACSe processes personal data on natural persons with whom we have (had) a direct or indirect relationship, or with whom we wish to have one in the future.

It concerns data on our current customers, suppliers, clients and employees, but also on potential customers and potential employees.

2) Why do we collect personal data

ACSe collects personal data for the following purposes:

- Client acceptance procedure

As a Réviseur d'entreprise agréé, we are subject to anti-money laundering Luxembourg legislation. In application of such legislation, our clients must go through a client acceptance procedure. For all services you wish to use, we collect your identifying data such as your name, address, phone number, email address, VAT number and scan your ID card.

This processing finds its legal basis in the legal obligation we are under.

- Delivering our services to customers

We also collect personal data to be able to deliver the requested services to you or our customers.

We collect socio-demographic data (e.g. your marital and family status), financial data (e.g. your income and possessions), personal details (e.g. age and gender), habits (e.g. information regarding social contacts or accidents), memberships (e.g. an association or organisation), housing characteristics (e.g. the rental price or expenses), data regarding education and training (e.g. professional training you had and membership in professional organisations), data regarding profession and job (e.g. your current employer or data regarding industrial medicine).

Taking into account our extensive service provision, the manner in which we process personal data may vary, depending on the service(s) a client wishes to use. For example, we process personal data on our client's employees, on a client's employees and customers while carrying out an audit for a client, about a client's customers while providing bookkeeping services, on a client's family members in the framework of asset planning.

This processing of personal data is necessary for the execution of our agreement with our client.

- Financial administration

ACSe processes personal data in order to maintain its own bookkeeping and invoicing. This concerns identifying data and invoice details.

On the one hand, this processing belongs to the legitimate interest of ACSe, especially regarding the possibility to maintain its administration and receive payment for services provided by it, and on the other hand, ACSe has a legal obligation to maintain its bookkeeping.

- Maintaining client relations

ACSe processes personal data for sending out mailings for our products and services, for which we think they might be of importance to you.

Sending mailings to our clients is part of our legitimate interest. It is both in your and our interest that our clients are informed of our activities and new services.

- Recruitment purposes

ACSe collects personal details to recruit new employees.

This processing finds its legal basis in, on the one hand, permission from the candidate employee and, on the other hand, in our legitimate interest to recruit a suitable candidate for a position.

- Security

If you enter our office buildings, you may be filmed. These camera images serve exclusively to secure our office buildings.

It is part of our legitimate interest to process these details in the framework of securing our infrastructure, our employees and our clients.

- Direct marketing

If you grant permission, we collect your contact details to send out newsletters, information regarding activities and other matters that might be important to you.

We may also collect so-called 'special categories' (art. 9 GDPR) of personal data, such as medical data (in the framework of asset planning or other optimisations). These data are only processed if you grant your explicit permission.

The types of personal data we collect may differ, depending on the services we provide to you or our client.

3) Who do we share your personal data with?

Your data will not be shared with third parties for commercial purposes.

3.1) Your personal data within ACSe

Within ACSe, we take the utmost care with your personal data and only share those data that are necessary to provide you with the best service.

ACSe has taken measures to ensure that personal data that are exchanged or shared within ACSe remain protected.

3.2) Your personal data outside ACSe

Sometimes, we are legally obligated to share your personal data with external parties, especially with the following third parties:

- Public authorities and regulatory institutions where there is a legal obligation to share or disclose client data, such as the tax administration.
- Judicial or investigative bodies, such as the police, public prosecution department.
Furthermore, there are third parties whom we are not legally obligated to pass on personal data to, but whom we rely on for many of the services we provide:
- Service providers who help us with:
 - The design and maintenance of our internet tools and applications;
 - Maintaining our servers.
- Social media applications we make use of.

We make use of social media applications on our website. We want to point out that all personal data you share with these social media applications may be read, collected and used for other users of these applications. ACSe has little to no control over these other users and can therefore not guarantee that all social media applications adhere to this Privacy Policy.

4) How do we protect your personal data

ACSe has developed several security measures to keep your personal data secure, correct and up-to-date. We specifically endeavour to avoid unauthorised access to or unauthorised modification, disclosure or deletion of personal data we have in our possession.

5) How long do we store your personal data

We do not store personal data longer than necessary for the performance of our activities and provision of our services, unless we are legally obligated to store your personal data longer or because the period in which a legal claim could be exercised is still ongoing.

In any case, your client file is not maintained beyond 10 years after termination of our client relation.

6) What rights do you have

You have several rights with regards to the personal data we process:

- The right to access:

You have the right to receive confirmation that we process personal data about you and to request a copy of the personal data we store about you free of charge.

- The right to improvement:

You have the right to request that we modify personal data we hold about you, or that we correct or supplement any incorrect personal data.

- The right to removal and limitation:

You have the right to request us to remove your personal data. In this case, you acknowledge that a request to removal of personal data means that certain services can no longer be provided.

You can also request us to limit our processing of your personal data.

- The right to object:

You have the right to object against the use of your personal data. You do need to motivate this request.

You can also explicitly object against processing your personal data for direct marketing purposes, for which you do not need to provide motivation.

- Right to data portability:

You have the right to obtain your personal data being processed by us in a structured, conventional and machine-readable format. You also have the right to have these data transferred to other parties responsible for processing.

- Right to withdraw your permission:

You always have the right to withdraw your permission to process your personal data (on the condition that its processing is based on your permission).

- Right to submit complaints:

You also have the right to submit a complaint to the Luxembourg Privacy Commission:

Commission nationale pour la protection des données (CNPD) :

1, avenue du Rock'n'Roll

L-4361 Esch-sur-Alzette

Tel.: (+352) 26 10 60-1

Or, through the website :

<https://cnpd.public.lu/en/particuliers/faire-valoir/formulaire-plainte.html>

If you wish to exercise the aforementioned rights, you can contact ablondlet@acse.lu. We may ask you to submit proof of identity before granting your request.

7) About this Privacy Policy

This Privacy Policy may be modified from time to time. All modifications will be recorded on this page.

If you have other questions regarding our privacy policy, please contact ablondlet@acse.lu.