1. **FOR WHOM IS OUR DATA PROTECTION NOTICE INTENDED?**
This notice is intended for our suppliers, current, former and prospective customers, and people showing an interest in our products or services.

2. **PARTY RESPONSIBLE FOR PROCESSING**
Your personal data is processed by ALIPA Group, which is made up of the following companies: No-Nail Boxes, All Pack Services, Codiprolux, Lifteurop/STAS and Walupack.
To contact us: gdpr@alipa.lu

3. **WHICH CATEGORIES OF PERSONAL DATA CAN WE PROCESS?**
   - **General personal data**
     - Individuals: Surname(s), first name, position, phone number (land line/mobile), email address.
     - Companies: Company name, delivery address, billing address, VAT number, contact person: Surname(s), first name, position, address, phone number, email address.

   We also save the date on which the personal data were communicated or on which certain adjustments were made to said data.

   - **Information on your interests or preferences**
     Personal data we have saved may also contain other information, notably your product preferences and information on your areas of interest you conveyed to us.

   - **Information related to your purchases**
     Personal data we have saved may also contain transactional information related to your purchases, such as items purchased, purchase date, potential returns and payment information. We may also save your responses or comments about products purchased as part of satisfaction surveys or market studies, or any complaint you lodge with us.

   - **Information related to cookies and similar technologies**

     When you visit our website or our e-commerce platform, we may record information through the use of “cookies”, which are stored on your computer, for statistical purposes (Google Analytics).

     We may also save information about you provided by third parties.

     We may use information provided by external partners to contact you for marketing purposes. When we contact you as part of a marketing campaign without you having disclosed your personal data to us, you can always make a request to find out through which external partner we received your personal information.

     Furthermore, we may also use third-party originated information to correct, complete or update your personal data or to create marketing profiles.

**Definition of “cookie”**

“Cookies are small text files that are stored by the browser on the hard drive of a visitor to a website and that are used (among other things) to record information about the visitor or about his or her use of the site. The webmaster can therefore recognise a visitor’s habits and personalise the site’s design for each visitor. Cookies enable the site to keep track of how many articles to display on the home page or even to save the login details of a possible private party: when the visitor returns to the site, he or she no longer has to enter his or her name and password in order to be recognised, since they are automatically sent by the cookie. A cookie has a limited life span, set by the website’s designer. Cookies can expire at the end of a session on the website, which corresponds to the browser being closed down.”[1]


**The “Google Analytics cookie”**

The Google Analytics cookie stores anonymous navigation information and, more specifically, on pages visited, the date and time of the visit, the source sites having authorised access to the website, the geographic area, and the computer equipment used (operating system, browser, screen resolution, etc.).
Google Analytics is a website analysis service provided by Google Inc. Google Analytics, which uses cookies, in order to help companies analyse how users use their sites. The data generated by cookies about your use of the site (including your IP address) will be transmitted and stored on servers located in the United States. Google will use this information for the purpose of assessing your use of the site, compiling reports on website activity for the site publisher and providing services related to website activity and use of the Internet.

4. FOR WHAT PURPOSE DO WE USE YOUR PERSONAL DATA AND WHAT IS THE LEGAL BASIS FOR HANDLING THIS PROCESSING?

With your authorisation:
- When you ask us questions through our website.
- For mailing newsletters for which you signed up or for managing your participation in our contests or marketing campaigns.

You may withdraw your consent at any time (see: “To exercise your rights”, below)

As part of executing your contract:
- For tracking and processing your order.
- For tracking and processing complaints and returns.
- For general customer service management, including accounting, management of disputes and legal proceedings, recovery or transfer of accounts receivable and overall protection of our rights.

When we have a legitimate interest, as part of our marketing activities:
In this case, we always strive to maintain a balance with your privacy rights.
- In order to inform you of our products and services, based ultimately on your marketing profile.
- In order to centralise, combine and enrich your personal data with helpful information originating from external partners.
- In order to prevent and fight potential fraud and abuses.

In order to meet the legal obligations by which we are bound:
We are also bound by tax and accounting obligations to store and send certain personal data to accounting and tax authorities.

5. CAN YOUR PERSONAL DATA BE SENT TO THIRD PARTIES?

Your personal data may be disclosed to our subcontractors as part of the provision of services on our behalf (example: communications agency, computer services, etc.), and only when authorised by us.

- Transfer of personal data outside the European Union
We may send your personal data outside the European Union. In this case, your personal data is protected by specific contractual obligations pursuant to privacy regulation obligations.

6. HOW LONG DO WE STORE YOUR PERSONAL DATA?

Your personal data is stored for the applicable legal duration and for as long as the business relationship is maintained.

7. HOW DO WE PROTECT YOUR PERSONAL DATA?

Your personal data are processed confidentially. We make every effort to take the technical and organisational measures needed to ensure your data security.

8. WHAT ARE YOUR RIGHTS? HOW CAN YOU EXERCISE THEM?

We are committed to compliance with the “Rights of the Interested Parties” recognised in the GDPR.

To exercise your rights:
You must send us a written request, along with proof of your identity, to the following address: ALIPA, 25 Salzbaach, L-9559 WILTZ or the following email address: gdpr@alipa.lu
You can also seek redress through the National Commission for Data Protection: cnpd.public.lu or info@cnpd.lu.