

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

ALIPA Group is made up of several companies that are each legal entities in their own right, unlike ALIPA which is a "brand". Certain services are centralised at the group level. As such, your personal data is processed by ALIPA Group, for each of the following companies:

No-Nail boxes S.A., All Pack Services S.A., Codiprolux S.A., STAS/Lifteurop S.A. and Walupack S.A.
To contact us: gdpr@alipa.lu

As a personal data controller within the meaning of European privacy regulations, ALIPA Group determines the purposes and means of personal data processing.

Personal data includes all information about an identified natural person.

Processing of personal data includes any possible operation involving such data, such as collection, recording, use or storage.

ALIPA Group processes your personal data exclusively for purposes related to its business activities, on the basis of various legal foundations, and ensures that only data which is strictly necessary is processed.

3. WHICH CATEGORIES OF PERSONAL DATA CAN WE PROCESS?

- Identification data: name, address, telephone number, email address, business contact information
- Professional information: employment, power of representation
- Financial information: bank details
- Transaction Data: details of transactions
- Information transmitted, e.g. by cookies and similar technologies, via websites and in emails. We may also save information about you provided by third parties, for example, information communicated by our distributors. 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.
- We also save the date on which the personal data were communicated or on which certain adjustments were made to said data.

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.

Privacy Notice

When we have a legitimate interest, as part of our marketing activities in order:

- To evaluate certain characteristics of data subjects based on automatically processed personal data ("profiling") in order to provide personalised offers and advice or information about our products and services.
- To develop our business relationship with you.
- To improve our internal sales organisation and operational activities, including risk management.
- To use this information for market research purposes or for advertising purposes, provided that the data subjects do not oppose the use of their personal data for promotional purposes.

If one or more of our personal data processing operations require that you give your prior consent, we will ask you in a timely manner.

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 the competent authorities, the courts and public administrations;
- to auditors and legal advisers;
- to our sub-contractors in the context of services provided to us (e.g., IT providers (website hosting, accounting software, database management system, etc.) and only based on our instructions.

We are committed to only transferring personal data in the circumstances indicated on an ad hoc basis to the data subjects, or in the event of operative obligations that are applicable to the latter, or in the event of a ruling by a court, a governmental, supervisory or regulatory authority, especially the tax authorities.

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 the regulations in force.

6. HOW LONG DO WE STORE YOUR PERSONAL DATA?

Your personal data is never stored beyond the time necessary for the processing for which it was collected, e.g. for the purposes set forth in point 4, subject however to the legal or regulatory requirements applicable to the storage of personal data for a longer period (accounting information) or to identify, exercise and/or defend any actual or potential rights in legal proceedings, investigations or similar proceedings, including retention for legal purposes that we may impose to preserve relevant information.

7. HOW DO WE PROTECT YOUR PERSONAL DATA?

We take all appropriate physical, technical and organisational measures to ensure the security and confidentiality of personal data to avoid as far as possible any unauthorised access, falsification, disclosure or destruction of personal data. None of the companies that make up the ALIPA Group may be held liable if a force majeure event occurs, such as a cyber-attack.

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.

If any of the ALIPA Group companies is unable to resolve the issue to your satisfaction, despite its best efforts to ensure compliance with its legal obligations, and, in the event of a dispute relating to the processing of personal data, you may lodge a complaint with the Luxembourg Data Protection Authority, the National Commission for Data Protection via their website: www.cnpd.public.lu/support/contact.html or at the following address:

National Commission for Data Protection, 1, Avenue du Rock'n Roll, L-4361 Esch-sur-Alzette

Privacy Notice

Si una de las empresas del Grupo ALIPA no ha podido proporcionarle satisfacción a pesar de todos sus esfuerzos para garantizar el cumplimiento de sus obligaciones legales y, en caso de una disputa relacionada con el tratamiento de datos personales, tiene la posibilidad de presentar una queja a la autoridad de protección de datos de Luxemburgo, la Comisión Nacional de Protección de Datos a través de su sitio: www.cnpd.public.lu/support/contact.html o a la siguiente dirección:

Comisión Nacional para la Protección de Datos, 1, avenue du Rock'n Roll, L-4361 Esch-sur-Alzette

In accordance with Regulation (EU) 2016/679 of 27 April 2016 on the protection of personal data, as a data subject, you have the following rights:

1. RIGHT TO BE INFORMED

To ask what personal data is processed by our company (member of the ALIPA group) and why. In the event of transfer to a third country, to be informed of the appropriate guarantees put in place for this transfer.

2. RIGHT OF ACCESS

To request access to your personal data held by our company (member of the ALIPA group) and to receive a copy thereof.

3. RIGHT TO RECTIFICATION

To request the rectification or erasure of your inaccurate, incomplete or irrelevant personal data to the extent permitted by law or as necessary for the performance of the contract or service, for example.

4. RIGHT TO CONTEST A DECISION MADE ON THE BASIS OF AUTOMATED PROCESSES

To assert your point of view and challenge, if applicable, any decision made on the basis of automated processes, including profiling.

5. RIGHT TO BE FORGOTTEN

To request the erasure of your personal data, unless there is a legitimate reason for it to be retained.

6. RIGHT TO DATA PORTABILITY

To recover, free of charge, the data communicated to our company (in a structured, commonly used and machine-readable format) and transmit it to another organisation (social network, Internet service provider, etc.).

7. RIGHT TO OBJECT

To bring to an end, at any time, any processing of personal data necessary for the pursuit of our legitimate interests, unless there are legitimate and compelling reasons to continue processing (for example, defence of legal claims).

8. RIGHT TO RESTRICTION OF PROCESSING

To request the restriction of the processing of your data in the event of a challenge to the accuracy of data, or to object to the erasure of data, if necessary for the establishment, exercise or defence of a legal claim.

In the case of a restriction, the data can no longer be subject to any processing.