



## Personal data processing policy

In accordance with the European General Data Protection Regulation (hereinafter referred to as the 'GDPR'), the purpose of this policy (hereinafter referred to as the '**Policy**') is to inform data subjects (hereinafter referred to as 'you') of various personal data processing operations (also referred to as 'personal data') carried out by **HËLLEF UM TERRAIN a.s.b.l.**, abbreviated to HUT (hereinafter referred to as '**HUT**') as data controller.

The Policy also informs you of your rights about such processing.

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## I. Who is responsible for processing personal data?

The party responsible for processing your personal data is HËLLEF UM TERRAIN a.s.b.l., established at 19-23, rue Jean-Fischbach, L-3372 Leudelange, registered with the Luxembourg Trade and Companies Register under number F14655.

If you have any questions or complaints about the processing of your personal data, or if you wish to exercise your rights under [point V](#) below, you may contact HUT and/or the Data Protection Officer ('DPO'), preferably by sending an e-mail to [dpohut@hut.lu](mailto:dpohut@hut.lu), or by sending a letter for the attention of the HUT Data Protection Officer to the address given above.

## II. What are the purposes of the processing, data subjects, categories of data, legal bases and data retention periods?

The table below explains the purposes and way HUT processes your personal data.

WHY? Purpose of data processing	WHO? People concerned	WHAT? Category of data processed	LEGAL BASIS?	DURATION? Maximum storage time
Website management <a href="https://hut.lu">https://hut.lu</a>	Users of / visitors to the Website	<ul style="list-style-type: none"> <li>• Cookies: Please consult the Website Cookies Policy <a href="#">here</a></li> <li>• Security of HUT's computer system: Internet Protocol, IP address (truncated)</li> </ul>	Legitimate interests pursued by HUT: management of the proper functioning of its website (essential technical cookies, security of the IT system), article 6 (1) (f) of the GDPR Consent (non-essential cookies), article 6 (1) (a) of the GDPR	1 month Please consult the Website Cookies Policy <a href="#">here</a>
Appeal campaigns and management of donations and legacies	Donors, legatees. Where applicable, person in whose name a donation is made on the occasion of a special event	<ul style="list-style-type: none"> <li>• Identification and contact details:</li> <li>• Surname, first name, contact details (email and postal addresses, if applicable, telephone number)</li> </ul>	Performance of a contract to which you are a party: donation or legacy contract, article 6 (1) (b) of the GDPR Compliance with HUT's legal obligations: bookkeeping,	10 years after the end of the financial year in question or the entire duration of ownership in the case of a real estate legacy or a legacy subject to conditions. Where applicable: The data and letters communicating to

		<ul style="list-style-type: none"> <li>• Data relating to donations and legacies:</li> <li>• Nature of donations, amounts, legal and banking documents</li> <li>• Donation certificates / tax receipts</li> <li>• Where applicable, correspondence relating to the donation or bequest</li> <li>• Where applicable, identification details and address of the recipient (or his family) of the list of donations made on behalf of this person</li> </ul>	<p>article 6 (1) (c) of the GDPR Legitimate interests pursued by HUT in financing activities to help people in need: fundraising campaigns and sending of donation certificates, if applicable: communication to the person honoured by the donation (or their family) of the list of donations made in their name, article 6 (1) (f) GDPR</p>	<p>the person honoured by the donation (or their family) the list of donations made in their name are kept for a maximum of 1 year after the end of the year in which the list was sent</p>
Marketing communications: newsletters and other communications about activities	Donors, people who sign up to receive the newsletter	<ul style="list-style-type: none"> <li>• Identification and contact data:</li> <li>• Last name, first name, position, company, e-mail address, postal address</li> </ul>	<p>Legitimate interests pursued by HUT: communications about its activities, public relations, Article 6 (1) (f) of the GDPR.</p>	<p>Until deregistration or 10 years of inactivity</p>
Management of events organized by HUT, such as training courses, conferences and other events	Participants, prospects	<ul style="list-style-type: none"> <li>• Identification and contact data: Surname, first name, job title, company, e-mail and postal addresses</li> <li>• Registration and event data</li> <li>• Invitations and correspondence</li> <li>• Data on food intolerances, if any (if a meal is offered)</li> </ul>	<p>Performance of a contract to which you are a party: e.g. training contract, Article 6 (1) (b) GDPR Legitimate interests pursued by HUT: organization of events for public relations purposes, photographs/films taken at public events, Article 6</p>	<p>3 years after the end of the year of the specific activity concerned 10 years for images</p>

			(1) (f) of the GDPR Consent of the data subject: photographs/films taken at private events food intolerances, Article (6) (1) (a) and, where applicable 9 (2) (a) of the GDPR	
Management of requests and notices	Any person sending a general request or notice to HUT	<ul style="list-style-type: none"> <li>• Identification and contact data: surname, first name, e-mail and postal addresses</li> <li>• Data concerning the request or notice</li> <li>• Communications, including via the Website contact form, the address <a href="mailto:contact@hut.lu">contact@hut.lu</a> or <a href="mailto:monavis@hut.lu">monavis@hut.lu</a></li> </ul>	Legitimate interests pursued by HUT: processing of requests and opinions submitted at the initiative of data subjects, Article 6 (1) (f) of the GDPR.	6 months after file closure*. *only in the case of a general request or opinion: in the case of a claim or dispute relating to a contract or service, the corresponding retention periods apply
Complaints and reports management	Any person submitting a complaint or report	<ul style="list-style-type: none"> <li>• Identification and contact data:</li> <li>• Surname, first name, contact details (email and postal addresses)</li> <li>• All data relating to complaints and reports</li> </ul>	Legitimate interests pursued by HUT: management of complaints, whistleblowing and service quality, Article 6 (1) (f) GDPR Compliance with HUT's legal obligations: whistleblowers, alerts, complaints and requests to exercise GDPR rights, Article 6 (1) (c) of the GDPR	10 years after the closure of the claim or after the end of the relevant relationship in the case of a dispute relating to a contract/service provision
Application management	Candidates for employment, volunteer or <i>freelance</i> work	<ul style="list-style-type: none"> <li>• Identification and contact data:</li> <li>• Surname, first name, contact details (e-mail and postal addresses),</li> </ul>	Execution of pre-contractual measures, Article 6 (1) (b) of the GDPR Legitimate interests pursued by HUT:	6 months after the end of the recruitment process concerned, except in the case of consent of the person concerned: 18 months and

		<p>telephone number)</p> <ul style="list-style-type: none"> <li>• Application data: CV data, covering letter, diplomas, other documents required for the position concerned as part of the recruitment process, including, where applicable, a copy of driving license, extract from criminal record, documents concerning the applicant's eligibility for a solidarity job.</li> <li>• Communications with applicants, via <a href="mailto:jobs@hut.lu">jobs@hut.lu</a> and <a href="mailto:benevole@hut.lu">benevole@hut.lu</a></li> <li>• Other data required to prepare the draft contract, including bank details</li> </ul>	recruitment management, Article 6 (1) (f) of the GDPR	criminal record: 1 month
Administrative and legal management of the association and its bodies	All service recipients and other interested parties	<ul style="list-style-type: none"> <li>• Identification and contact data: surname, first name, nationality, date of birth, e-mail and postal addresses, telephone number.</li> <li>• Data concerning personal and social status, including "sensitive" data (health data, data concerning sex life, data relating to an application</li> </ul>	Performance of a public-interest mission of social care based on agreements concluded with the State, Article 6 (1) (e) of the GDPR and, where applicable, Article 9 (2) (h) of the GDPR for so-called "sensitive" data, e.g. health data Compliance with HUT's legal obligations: bookkeeping,	10 years after the end of the year in which the beneficiary permanently leaves the company / the file is closed

		<p>for asylum or refugee status: where applicable, political opinions, religious beliefs, racial or ethnic origin, sexual orientation).</p> <ul style="list-style-type: none"> <li>• Administrative, legal and financial data</li> </ul>	<p>reporting criminal offences, Article 6 (1) (c) of the GDPR Performance of a contract to which the beneficiary is a party: e.g. hosting contract, CSSU contract, Article 6 (1) (b) of the GDPR) Legitimate interests pursued by HUT: management of services, quality, statistics, Article 6 (1) (f) of the GDPR</p>	
Administrative and legal management of the association and its bodies	Members of the association and its bodies, including the Board of Directors	<ul style="list-style-type: none"> <li>• Identification and contact data of members and contact persons of legal entities: Surname, first name, position, company, nationality, date of birth, e-mail and postal addresses, telephone number.</li> <li>• Invitations to meetings and general assemblies</li> <li>• Subscriptions and other payments</li> <li>• Correspondence</li> </ul>	<p>Compliance with HUT's legal obligations: law on associations, bookkeeping, Article 6 (1) (c) of the GDPR Performance of a contract to which the representatives are party: directors' mandate contract, article 6 (1) (b) of the GDPR) Legitimate interests pursued by HUT: management of the association, article 6 (1) (f) of the GDPR</p>	10 years after the end of the financial year of the year in question (accounting) or after the end of the financial year in which participation in the association/mandate ended (member of the association or one of its bodies)

The maximum retention periods indicated above may be extended in cases of dispute. In such cases, data may be kept for a period corresponding to the maximum legal statute of limitations applicable to the case in question.

### III. How the association collects your personal data?

Personal data may be collected directly from you. In some cases, HUT may receive personal data from government departments and public authorities, from other professionals involved in social care or from third-party partner organizations (e.g. when organizing joint events).

### IV. Who will receive your personal data?

We may share some of your personal data with the following categories of recipients:

- Internal recipients: HUT staff from social inclusion and anti-poverty departments and support services (in particular: accounting, IT, HR, quality control), management, where applicable, members of the association's governing bodies.
- External recipients:
  - Third-party service providers, including, where applicable, data processors, who provide HUT with services required in connection with the fulfilment of the processing purposes described above, including IT, accounting, billing, auditing, marketing, training, legal and auditing services. These third parties are authorized to use personal data to the extent necessary to enable them to provide their services to us.
  - Administrations and public authorities: transmission/exchange of data in the context of the performance of HUT's tasks and legal obligations, such as administrations with which a state financing agreement has been concluded for the performance of various tasks, supervisory authorities issuing approval for the activities carried out, social offices or bodies, the national health fund (CNS), the joint social security centre (CCSS), other competent authorities, including, where applicable, judicial authorities;
  - Where applicable, transmission of data between professionals involved in the social care of a beneficiary.
  - Where applicable, transmission of data between organizers of joint events.

Access to personal data is based on the need-to-know principle, according to the purpose of the processing.

- Where applicable, when a person makes a donation on behalf of another person for a special event, the latter person or his or her family (e.g. death) is informed of the details of the donation (surname, first name, address of the donor and amount of the donation) as well as the communication accompanying the donation

## V. What are your rights concerning your personal data?

In accordance with the GDPR, any person affected by the processing of personal data has a series of rights, which are as follows:

- **Right of access to your personal data** (article 15 of the GDPR): You have the right to request:
  - Confirmation that your personal data is or is not being processed by HUT.
  - Where HUT processes your personal data, a copy of said data together with information on how it is processed (e.g. purposes of processing, categories of data, recipients, retention period).
- **Right to rectify** your personal data (Article 16 of the GDPR): You have the right to request:
  - The rectification of personal data concerning you that is inaccurate.
  - That personal data concerning you that is incomplete be completed, including by means of an additional declaration.
- **Right to obtain the deletion** of your personal data (Article 17 of the GDPR): You have the right to erase all or part of your personal data under the conditions defined by the GDPR.
- **Right to limitation** (Article 18 of the GDPR): You have the right to limit the processing of all or part of your personal data, under certain conditions and in certain cases defined by the GDPR.
- **Right to portability** (Article 20 of the GDPR): Where processing is based on your consent or the performance of a contract, and is carried out using automated processes, you have the right to request:
  - The personal data you have provided us with in a structured, commonly used and readable format; and
  - The transmission of said data to a third party of your choice.
- **Right to object** (Article 21 of the GDPR): You have the right to object to the processing of your personal data in the cases defined by the GDPR.
- **Right to withdraw consent** (Article 7.3 of the GDPR): You have the right to withdraw your consent to the processing of your personal data at any time. However, this withdrawal does not affect the lawfulness of the processing based on the consent carried out prior to the withdrawal.
- **Right to lodge a complaint:** where applicable, if you consider that the processing of personal data concerning you constitutes a breach of the GDPR, you have the right to lodge a complaint with the competent supervisory authority, which in Luxembourg is the Commission nationale pour la protection des données.

HUT also informs you that where a request relating to the rights is manifestly unfounded or excessive, due to its repetitive nature, HUT may refuse to grant it or, where applicable, demand payment in accordance with the GDPR.

## VI. Who to send your questions or complaints to?

To exercise your rights in relation to your personal data or if you have any other questions or complaints about our data processing, you can contact us, preferably by e-mail at [GDPRhut@hut.lu](mailto:GDPRhut@hut.lu) and/or [dpohut@hut.lu](mailto:dpohut@hut.lu) or write to us at the address given in section 1 of this Policy.

If - after having contacted HUT and after having received our explanations - a data subject still considers that his or her data protection rights have not been respected, he or she may lodge a complaint with the National Data Protection Commission. ([www.cnpd.lu](http://www.cnpd.lu)).

## VII. Links to other websites

The Website may contain hyperlinks to third-party websites. This Policy does not apply to third-party content or websites for which HUT assumes no responsibility.

## VIII. Revisions to this policy

HUT reserves the right to modify or update this Policy at any time. The applicable version of this Policy will be published on the Website, which data subjects are invited to consult regularly. More detailed information notices, specific to certain services and personal data processing, may also be provided to the persons concerned by these services.

*This document has been automatically translated using an online translation tool. It may therefore contain translation errors. For further information, please consult [the original French version](#).*