

## Privacy statement for customers and service providers of itrust consulting s.à r.l.

### I. General information

<b>Last updated</b>	26 September 2018
<b>Our commitment</b>	itrust consulting is committed to protecting your privacy and ensuring the protection of your personal information. This privacy statement explains the type of personal data (hereafter called PII, personal identifiable information) we collect and how we use, disclose and protect it.
<b>What does this statement cover?</b>	These rules of conduct on privacy apply to all PII that you have transmitted during an approach to an employee of itrust consulting and that can be processed during commercial activities.
<b>Who is responsible for your data?</b>	The company itrust consulting is responsible for your PII and ensures compliance with the regulations. You can contact itrust consulting or its Managing Director under: Carlo Harpes, <a href="mailto:info@itrust.lu">info@itrust.lu</a> , +352 26 17 62 12. Additionally, itrust consulting has appointed a data protection officer to assist you in executing your rights. You can reach him under: Matthieu Aubigny, <a href="mailto:dpo@itrust.lu">dpo@itrust.lu</a> , +352 26 17 62 12.
<b>How to change these rules?</b>	We may change this privacy statement by posting an updated version on our website. For every major change, we will post a notice in the Home page on our website in the news section.

### II. Our Privacy Principle

itrust consulting takes privacy seriously. In accordance with the privacy policy implemented within our company, the following five principles are at the basis of our service approach to respect your privacy:

1. We always use your PII in a fair, trustworthy and transparent way for specified, explicit and legitimate purposes.
2. You have the right to be clearly informed about how we use your PII. We will always be transparent to you about the data we collect and the way we use it.
3. If you have concerns about how we use your PII, we assist you in understanding our treatments.
4. We will take all reasonable steps to protect your information from abuse and to keep it safe.
5. We are committed to all European and national privacy regulations and shall cooperate with your national supervisory authority (in Luxembourg the CNPD) regarding privacy where necessary.

## III. Privacy policy rules at itrust consulting

### Your consent is important

If we collect your PII which do not result from a legal, contractual obligation or a clear legitimate interest, itrust consulting informs that their transmission is optional and implies before to receive consent to be processed by itrust consulting in compliance with the present conditions.

If you do not want anymore that we process your data, you can withdraw your consent at any time without inconvenience.

### How do we collect your PII?

In these privacy rules, your PII means one or more set(s) of information that could identify you directly or indirectly. This generally includes information such as your name, address, identifiers, profile image, email address, and telephone number, electronic information (IP address, browsing information), but may also include other information about your past or current business activities and also information including PII which you may transmit to us. We may collect PII from a variety of sources, including:

1. Information you give us directly;
2. Information that we may collect via our browsing activities on our websites itrust.lu and malware.lu., and we may collect on sources like LinkedIn, twitter, etc.

### How we use your personal information?

We use your PII in the context of the overall management of our business activity, only:

1. to manage information (potentially including PII) according to contracts (consulting, audit, training, research...);
2. to learn from past experience in our projects for upcoming projects (knowledge management), or to train new staff;
3. to carry out contracts including invoicing and justification of work performed (e.g. with timesheets and progress reports);
4. to manage IT activities with the aim of information security (including service availability), and to detect and handle threats, vulnerabilities, risks, and incidents;
5. to manage employment contracts, to ensure workplace safety, and to manage application information;
6. to demonstrate consistency of our accounting system to tax authorities and interested parties;
7. to perform forensic analysis and propose effective reactions to security events, to detect frauds and vulnerabilities, to understand malware and malware producers, and to share this knowledge with other security experts fighting against cybercrime;
8. trace the validity of our reports and advice for justifying professionalism.

When we collect PII for these purposes only, we do not retain them longer than necessary to fulfil that purpose.

To protect this data from accidental or malicious destruction, we have implemented backup solutions, and when we delete it from our services, we may not immediately delete residual copies of our servers or backup systems.

## Do we share your PII?

As a general rule, we do not share your PII outside itrust consulting, except if documented in a contract.

However, we may share your PII with organizations if we believe that disclosure of the information is necessary for legal or regulatory reasons, e.g. in connection with a lawsuit.

## Do we transfer your PII to other countries?

We do not transfer any of your personal information to servers outside the European economic area (EEA) or to a country not subject to the EU Commission's standard contractual clauses. We use subcontractors who undertake to keep your data on EEA territory or we ensure that processing activities are covered by a European Commission adequacy decision regarding the privacy issues, in particular in the case described hereafter. For further information about our subcontractors you may contact our DPO.

## How do we protect your PII?

We take reasonable security measures to protect your personal information at any times and require any third party who handles or processes your PII for us to do so.

If itrust consulting collaborates with other companies, the choice of these companies will only be made after a complete selection process. In this selection process, each individual service provider is carefully selected for its relevance in terms of technical and organizational data protection expertise. This selection process will be documented and a contract for the processing of contractual data will only be concluded if the service provider complies with the identified security requirements, including European and national regulatory requirements.

Access to your PII is restricted to prevent from unauthorized access, modification or misuse, and is only permitted to our employees who need it for their work.

## Specific processing of your data

### Cookies

Our websites use technologies such as 'cookies' or other web tools to help us improve your experience and our services. These technologies help us to better understand user behaviour, tell us which parts of our website users have visited, and facilitate and measure the effectiveness of your experience. Although some of these technologies are necessary for communication purposes or to provide you with our core services and as such do not explicitly require your consent, we will inform you of their use.

Most browsers are set to automatically accept cookies. In general, you can prevent the storage of cookies on your hard disk by selecting 'Do not accept cookies' in your browser settings. You can also configure your browser to ask permission before storing cookies. Finally, you can delete previously set cookies at any time. Please refer to the instructions of your browser on how to implement this measure. If you set your privacy setting as such, however, it may happen that you cannot fully use all the features of our website.

### Use of Matamo Analytic

Our website uses Matamo (formerly Piwik). This is an open source service for analysing accesses to websites and allows us to improve our internet presence. The information collected by means of a cookie (IP address, access time, access duration) is transmitted to InnoCraft Cloud in France. The evaluation of their activities on our website is transmitted to us in the form of reports. By using our website, you agree to the processing of the data collected about you by Matamo.

Some browser extensions exist which allow you to disable and control Analytics tracking.

## Marketing and advertising

In addition to providing our services, and on explicit opt in for newsletters by the user, we will use your PII to communicate with you about our offers or marketing promotions and to recommend other services that may interest you. In particular, these offers may contain references to new service offers in line with the present processing purposes.

If you no longer want to receive these recommendations or newsletters from us, you can object to this at any time by disabling this in your settings, contacting us or by using the link that you find in each of our communications.

## What are your rights and how can you exercise them?

If you have any questions, comments or concerns about how we handle your PII, you can contact the data controller, the managing director or the data protection officer directly.

You have the right to:

1. receive a structured copy of your PII we process;
2. ask us to correct, update, or delete your PII from our records;
3. report to us any misuse of your PII;
4. totally or partially withdraw your consent to the PII processing.

If you feel that your PII has not been processed in accordance with the law, you should contact our DPO for clarification. You may also refer your complaint to your national data protection authority, in Luxembourg, the CNPD ([www.cnpd.lu](http://www.cnpd.lu) or [databreach@cnpd.lu](mailto:databreach@cnpd.lu)).