# **Privacy Policy of Gaialux ASBL Luxembourg**

Last update: 06/02/2025

#### 1. Introduction

Gaialux ASBL Luxembourg (hereinafter referred to as "association", "we", "us") is committed to protecting the privacy of its members, volunteers, and supporters. This privacy policy describes how we collect, use, and protect personal data in compliance with Regulation (EU) 2016/679 (GDPR).

#### 2. Data Controller

Gaialux ASBL Luxembourg Email: gaialux.asbl@gmail.com Phone: +352 661100129

For any questions regarding this privacy policy or the use of personal data, you can contact us at the email address provided above.

## 3. Personal Data Collected

The Association collects and processes only the following personal data:

- · First and last name
- Email address
- Phone number
- Payment data (only for those who make donations or payments, e.g., IBAN or other necessary transaction details)

We do not collect sensitive data, nor do we perform automated profiling of users.

#### 4. Purposes and Legal Bases of Processing

Personal data is processed exclusively for the following purposes:

Purpose	Legal Basis
Managing membership in the Association	Consent of the data subject (Art. 6(1)(a) GDPR)
Communications regarding the Association's activities (events, newsletters)	Consent of the data subject (Art. 6(1)(a) GDPR)
Managing donations and membership fees	Performance of a contract (Art. 6(1)(b) GDPR)
Compliance with tax and accounting obligations related to payments	Legal obligation (Art. 6(1)(c) GDPR)

The Association does not use data for direct marketing purposes and does not sell data to third parties.

## 5. Data Retention Period

We retain personal data only for the time necessary to fulfill the purposes for which it was collected:

- Member data: up to 5 years after membership termination
- · Data for communications (e.g., newsletter email addresses): until consent is withdrawn

## 6. Data Sharing and Transfers

We do not sell or transfer personal data to third parties. However, some data may be shared with:

- IT service providers (e.g., email platforms, website management services)
- · Competent authorities, if required by law
- Payment services (e.g., banks, electronic payment platforms, only for those making transactions)

Data is not transferred outside the European Economic Area (EEA) without adequate protection measures.

## 7. Rights of Data Subjects

Under the GDPR, users have the right to:

- · Access their personal data (Art. 15 GDPR)
- Request the rectification of inaccurate data (Art. 16 GDPR)
- Request the deletion of data ("right to be forgotten" Art. 17 GDPR)
- Restrict data processing (Art. 18 GDPR)
- Object to data processing (Art. 21 GDPR)
- Request data portability (Art. 20 GDPR)

To exercise these rights, please write to: gaialux.asbl@gmail.com The Association will respond within 30 days.

## 8. Data Security

We implement appropriate security measures to protect personal data, including:

- SSL encryption for data transmission
- · Restricted access to data for authorized personnel only
- Server protection and regular backups

However, no IT system is completely secure. In the event of a data breach, we will notify affected individuals and the competent authority.

## 9. Changes to the Privacy Policy

We reserve the right to update this Privacy Policy at any time. Users will be informed of any significant changes via our website or email.

## **10. Contact Information**

For questions regarding the Privacy Policy or to exercise your rights:

Gaialux ASBL Luxembourg Email: gaialux.asbl@gmail.com Phone: +352 661100129

This Privacy Policy is GDPR-compliant and ensures the protection of personal data managed by Gaialux ASBL Luxembourg.