



## **PERSONAL DATA PROTECTION POLICY PERSONAL**

### **SOS FAIM- LUXEMBOURG ACTION POUR LE DÉVELOPPEMENT, ASBL**

**Commercial Register No.: F0000554**

**Legal form: Non-profit association under Luxembourg law**

**Date of incorporation: 24/04/1993**

**Registered office: 17-19, avenue de la Libération L-3850 Schifflange**

**Email: [info-luxembourg@sosfaim.org](mailto:info-luxembourg@sosfaim.org)**

SOS FAIM - LUXEMBOURG ACTION POUR LE DÉVELOPPEMENT, ASBL (hereinafter referred to as "SOS FAIM"), respects the privacy of its stakeholders and strictly complies with the laws in force on the protection of privacy and individual freedoms. The purpose of this personal data protection policy is to inform you about the conditions under which your personal data is collected and processed when you browse the website accessible at the following addresses: [www.sosfaim.lu](http://www.sosfaim.lu), [sosfaim.org](http://sosfaim.org), [sosfaim.com](http://sosfaim.com), [sosfaim.eu](http://sosfaim.eu), [sosfaim.fr](http://sosfaim.fr), [sosfaim.de](http://sosfaim.de) and [soshunger.de](http://soshunger.de) (hereinafter referred to as 'the website').

'Personal data' means any information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his or her identity.



## **1. What personal data may be processed and for what purpose?**

Your personal data may be collected and processed when you use certain services offered on the website.

### **Forms**

In accordance with the provisions of Regulation No. 2016/679, known as the General Data Protection Regulation (GDPR), which came into force on 25 May 2018, the information collected on the forms on the website is stored in computerised files and kept in accordance with secure protocols so that we can get back in touch with you.

The personal data collected on the forms is transferred by email to the relevant departments of SOS FAIM and is reserved for the sole use of these departments.

This data will be kept for as long as it remains necessary for the fulfilment of the above-mentioned purposes and is only recorded to the extent necessary to respond to you.

Access to this data will be strictly limited to employees and members of the Board of Directors of SOS FAIM who are directly or indirectly involved in the processing of your requests, as well as to persons or companies commissioned by SOS FAIM for this purpose. This data will under no circumstances be communicated or transferred to third parties.

### **Newsletters**

The website includes the option to subscribe to the SOS FAIM newsletter via plug-ins from the Mailchimp system operated by The Rocket Science Group, LLC, located at 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, United States (hereinafter referred to as 'Mailchimp').

When you visit the Newsletter page on our website, a direct connection is established between your browser and the Mailchimp server. This provides Mailchimp with the information that you have visited our website with your IP address.

If you fill out the SOS FAIM newsletter registration form on our website, your contact details will be transmitted to and processed on Mailchimp's servers. This data will be retained for as long as SOS FAIM deems it useful for its communication and marketing needs.

For more information, please refer to Mailchimp's privacy policy at <https://mailchimp.com/fr/legal/>.



By subscribing to the newsletter, you authorise SOS FAIM to send you messages and information by email, as often as SOS FAIM deems necessary, for as long as you do not request to unsubscribe from the newsletter. Data relating to your consultation of the newsletters sent to you (opening, browsing, etc.) will also be stored and processed.

Access to the data collected when you subscribe or when you view the newsletters will be strictly limited to employees and members of the SOS FAIM Board of Directors, as well as to individuals or companies commissioned by SOS FAIM for communication or marketing purposes. This data will not be communicated or transferred to third parties under any circumstances.

## **Donations**

When making a donation to SOS FAIM via PayPal, by credit card via PayPal, by direct debit via PayPal or (if offered) 'purchase on account' or 'instalment payment' via PayPal, we transmit your payment details to PayPal (Europe) S.a.r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg (hereinafter 'PayPal').

The transfer takes place in accordance with Article 6(1)(b) GDPR exclusively to the extent necessary for payment processing. PayPal reserves the right to perform credit checks for payment methods by credit card via PayPal, direct debit via PayPal or – if offered – 'purchase on account' or 'instalment payment' via PayPal. For this purpose, your payment data may be transmitted to credit agencies in the legitimate interest of PayPal to determine your creditworthiness in accordance with Article 6(1)(f) GDPR.

PayPal uses the result of the credit assessment in relation to the statistical probability of non-payment to decide whether to make the respective payment method available. The credit report may contain probability values (known as score values). If score values are included in the credit report result, they are based on a scientifically recognised mathematical-statistical procedure.

The calculation of credit scores includes, but is not limited to, postal correspondence data. For more information on the data protection policy and the credit agencies used, please refer to PayPal's Privacy Policy at : [https://www.paypal.com/fr/webapps/mpp/ua/privacy-full?locale.x=fr\\_FR](https://www.paypal.com/fr/webapps/mpp/ua/privacy-full?locale.x=fr_FR)

You may object to the processing of this data at any time by sending a message to PayPal. However, PayPal may continue to process your personal data if this is necessary for the processing of payments.



## **2. Does SOS FAIM use cookies or other tracking devices?**

The website uses customer cookies and a tracking system.

### **a. Cookie management**

The website may use customer cookies to analyse information relating to user browsing. A cookie is a text file stored by your browser in a dedicated space on your computer when you visit a website. Under no circumstances does this file allow the person who placed it there to obtain information stored on your hard drive or personal information. In general, cookies are used to improve our services and make them more efficient.

Our website uses cookies to measure its audience and, based on statistical information collected on browsing patterns, to improve its accessibility. They are placed by this website on your computer. They contain, in particular, the name of the server that wrote them, an identifier in the form of a unique number and an expiry date. You can decide for yourself whether or not the site is authorised to store cookies on your computer. Furthermore, you can choose at any time to adjust your browser settings so that cookies are not accepted and stored.

Furthermore, you can delete cookies that have already been saved at any time via your browser. The use of certain features of this portal cannot be restricted or disabled under any circumstances if the user refuses cookies.

### **b. Tracking system**

In order to improve our service, we collect 'tracking data'.

This data provides information about your behaviour on our website. Such tracking data does not allow us to identify you. The tracking system used: Google Analytics

You can object to the collection and processing of this data by Google Analytics by installing an opt-out cookie that prevents the future collection of your data when you browse this website:  
<https://tools.google.com/dlpage/gaoptout?hl=fr>

For more information, please consult the Google Analytics privacy policy.



### **3. What are your rights regarding your personal data?**

Under the GDPR, you have a number of rights.

#### **a. Right of access**

You have the right to obtain confirmation from SOS FAIM as to whether or not personal data concerning you are being processed and, where they are, access to those personal data and the following information:

- ✓ The categories of personal data collected and processed;
- ✓ The purposes for which they are processed;
- ✓ The categories of recipients to whom the personal data have been disclosed or are likely to be disclosed;
- ✓ The period for which the personal data will be stored;
- ✓ Information about your rights with regard to your personal data.

#### **b. Right to object**

You may object, on legitimate grounds, to any processing of your personal data.

Thus, SOS FAIM will no longer process your personal data unless it can demonstrate SOS FAIM will therefore no longer process your personal data, unless it can demonstrate that there are legitimate and compelling reasons for the processing that override the interests and rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

#### **c. Right to rectification**

You have the right to request that your personal data be corrected if it proves to be inaccurate, incomplete or obsolete.

#### **d. Right to be forgotten**

You may request the erasure of your personal data. However, this right is not absolute and may conflict with the legitimate interests of the data controller or the legal obligations to which the latter is subject. For example, a person who has to pay a bill cannot request the erasure of their data in order to avoid paying their debt, as the retention of their debtor's data is in the legitimate interest of the data controller. For example, a person who has to pay an invoice cannot request the erasure of their data in order to avoid paying their debt, as the retention of their debtor's data is in the legitimate interest of the data controller at least until payment has been made or until the legal period for storing accounting documents has expired.



#### **e. Right to restriction of processing**

You may require SOS FAIM to rectify, complete, update, block or erase personal data concerning you that is inaccurate, incomplete, ambiguous, outdated, or whose collection, use, communication or storage is prohibited.

#### **f. Right to data portability**

You have the right to receive your personal data collected or processed by SOS FAIM in a structured, commonly used and machine-readable format, and the right to transmit this data to another data controller without SOS FAIM, to whom the personal data has been communicated, preventing this.

### **4. Who to contact in the event of a dispute or question?**

If you wish to exercise these rights, please contact Data Protection & Compliance

Postal address: SOS FAIM  
Data Protection & Compliance Officer  
17-19, avenue de la Libération L-3850 Schifflange  
Email: [info-luxembourg@sosfaim.org](mailto:info-luxembourg@sosfaim.org)

In addition, you have the option of lodging a complaint with the Commission

Nationale pour la Protection des Données (CNPD).  
Postal address: 1, Avenue du Rock'n'Roll, Esch-sur-Alzette Telephone: +352 26 10 60 -1

### **5. Which social plugins are used by SOS FAIM?**

The website integrates a multitude of social plugins.

#### **a. FACEBOOK**

The website integrates social plugins (hereinafter referred to as Plugins) from the social network Facebook, which is operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, United States (hereinafter referred to as "Facebook"). You can find an overview of Facebook plugins at: <https://developers.facebook.com/docs/plugins>



When you visit our pages, the plugin establishes a direct connection between your browser and the Facebook server. This gives Facebook the information that you have visited our site with your IP address. If you click on the Facebook button while logged into your Facebook account, you can link the content of our pages to your Facebook profile. This allows Facebook to associate your visit to our pages with your user account. As the provider of the pages, we do not receive any information about the content of the data transmitted or its use by Facebook. For more information, please refer to Facebook's privacy policy at : <https://www.facebook.com/privacy/policy/>

If you do not want Facebook to associate your visit to our website with your Facebook user account, you must log out of your Facebook user account. You can also completely block the loading of Facebook plugins by your server using add-on modules, such as Facebook Blocker.

## **b. LINKEDIN**

The website integrates social plugins (hereinafter Plugins) from the LinkedIn social network, which is operated by LinkedIn Ireland Unlimited Company, Wilton Plaza, 2 Wilton Place, Dublin, Ireland.

When you visit our pages, the plugin establishes a direct connection between your browser and the LinkedIn server. This gives LinkedIn the information that you have visited our site with your IP address.

If you click on the LinkedIn button while logged into your LinkedIn account, you can link the content of our pages to your LinkedIn profile. This allows LinkedIn to associate the visit to our pages with your user account. As the provider of the pages, we do not receive any information about the content of the data transmitted or its use by LinkedIn.

For more information, please refer to LinkedIn's privacy policy at : <https://fr.linkedin.com/legal/privacy-policy>

If you do not want LinkedIn to associate your visit to our site with your LinkedIn user account, you must log out of your LinkedIn user account.



### **c. VIMEO**

The website integrates social plugins from the social network Vimeo, which is operated by Vimeo Inc. located at 555 West 18th Street, New York, New York 1011, United States (hereinafter referred to as 'Vimeo').

When you visit our pages, the plugin establishes a direct connection between your browser and the Vimeo server. This gives Vimeo the information that you have visited our site with your IP address.

If you click on the Vimeo button while logged into your Vimeo account, you can link the content of our pages to your Vimeo profile. This allows Vimeo to associate your visit to our pages with your user account. As the provider of the pages, we do not receive any information about the content of the data transmitted or its use by Vimeo.

For more information, please refer to Vimeo's privacy policy at :

<https://vimeo.com/legal/privacy/policy>

If you do not want Vimeo to associate your visit to our site with your Vimeo user account, you must log out of your Vimeo user account.

## **6. What measures are taken to ensure the protection of your personal data?**

SOS FAIM implements appropriate technical and organisational measures concerning the processing of personal data in order to ensure a level of security appropriate to the risk. In addition, SOS FAIM is committed to constantly improving its security measures in line with technological developments.

### **Notification in the event of a personal data breach**

In the event of a personal data breach, SOS FAIM will notify the competent supervisory authority of the breach in question in accordance with Article 55 of the GDPR, as soon as possible and, if possible, no later than 72 hours after becoming aware of it, unless the breach in question is unlikely to result in a risk to the rights and freedoms of natural persons. Where notification to the supervisory authority is not made within 72 hours, it shall be accompanied by the reasons for the delay.

Furthermore, where a personal data breach is likely to result in a high risk to the rights and freedoms of a natural person, SOS FAIM shall communicate the personal data breach to the data subject without undue delay.

Done at Schiffange, November 2023