

PRIVACY POLICY

Protecting your personal data is a priority for LABEL R. In this regard, we undertake to respect the personal data of natural persons acting as contacts within the organisations of our clients, prospective clients, and suppliers and of the natural persons being in the management of these entities (hereinafter referred to as 'You'), to process them with the greatest care and to provide the best level of protection for them in accordance with Regulation (EU) No2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and the national regulations applicable in this field.

This charter provides information on the protection and processing of your data within LABEL R regarding:

- the personal data that we collect about you and why we do so;
- the methods of use of your personal data;
- Your rights regarding to your personal data and the means of exercising these rights.

Most recently modified on: [31.08.2018](#).

Explanatory glossary of the main legal terms used in this Charter:

Terms that are often used in this Charter	Definitions provided by the GDPR (General Data Protection Regulation)	Explanation of the terms in standard language
Data of a personal nature (hereinafter 'personal data')	Any information relating to an identified or identifiable natural person (hereinafter 'the data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.	All sorts of information relating to a natural person, that is an individual, who can be identified as a person, directly or indirectly, who can be distinguished from other people. Examples: a name, a photo, an e-mail address, a telephone number, an IP address, a voice mail, your browsing data on a website, etc.
Processing	An operation or set of operations which is performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.	Any use of personal data, regardless of the procedure involved (recording, organisation, storage, adaptation, alignment with other data, transmission, etc. of personal data). Example: the use of your data to manage a contractual relationship, send a newsletter, etc.
Controller	The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.	The person, public authority, company or body which manages your data and determines how they are used. He/she decides whether to start or discontinue processing and determines why your data will be processed and to whom they will be transferred.

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		He/she is the main party responsible for ensuring the protection of your data.
Processor	The natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.	Any natural or legal person that performs processing tasks following the instructions and under the responsibility of the controller.

Explanatory glossary of the other terms used in this Charter:

Client	A company that has already entered into a service contract with us
Prospect	A company that may be interested in entering into a service contract with us
Supplier	Any company that supplies services to us within the framework of our activities (auditors, lawyers,...)

1. Who is responsible for the use of your personal data?

The Controller responsible for the processing of your personal data is LABEL R, the head office of which is at 65 Greene Street, New York, NY 10012, registered under the following registration number: EIN 61-1930307

Please send any questions or requests relating to the processing of your personal data the following address: label-r@label-r.com

2. Why do we collect your personal data and on what grounds?

We collect personal data about you for different reasons.

LABEL R collects and uses your personal data to function effectively and offer you the best experience with its services.

We can only collect and use your personal data if this use is based on one of the legal grounds defined by the GDPR (e.g. your consent or the performance of a contract).

The table below identifies the exact purposes for the use of your personal data by LABEL R and the corresponding legal grounds.

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Purposes of use of your personal data	Legal grounds for the processing of your personal data
Management of the Client and Prospective Client relationship	The legitimate interest of LABEL R to collect and process data relating to the contact persons and/or managers, within the organisations of its Clients and Prospects as part of the negotiation and/or performance of its contractual services, the need to negotiate and or perform this contract (Article 6.1.c) and f). of the GDPR)
Marketing to our Clients and Prospects (namely the sending of newsletters, information about our services, invitations to professional events, etc..)	LABEL R has a legitimate interest to process data relating to contact persons within the organisations of its Clients and Prospects with a view to offering them services, and providing them with information about its activities. Your consent is sometimes required by specific rules relating to email advertising (article 11 of the law of 30 May 2005 on the protection of data and electronic communications)
Management of Suppliers	The legitimate interest of LABEL R to collect and process data relating to the contact persons within the organisations of its Suppliers and the need to negotiate and/or perform the contract with your company (Article 6.1.f) and b), GDPR).
Management of disputes and disputed facts/events (with our Clients, Prospects and Suppliers)	The legitimate interest of LABEL R to collect and process data relating to the contact persons and managers within the organisations of its Clients, Prospects and Suppliers with a view to managing a dispute or disputed facts/events or obtain a legal advice and the need to perform the disputed contract. (Article 6.1.f) and b) of the GDPR).

3. What personal data do we collect about you?

Please be aware that the personal data that we collect about you depend on the nature and number of relationships that you have with LABEL R, whether they are of a legal nature (e.g. entering into of a contract, legal obligation, legitimate interest) or not (e.g. visit to our website).

Provided below are the details of the personal data that we collect, the reason we collect them, and the way in which they are collected (directly or indirectly).

Purpose of data collection	Personal data collected	Direct or indirect collection of your personal data
Management of the Client and Prospective Client relationship	Data of the contact persons within the organisations of Clients and Prospects (surname, first name, position, address, telephone number, mail address)	For this purpose, the data is collected directly from you
Marketing to our Clients and Prospects (namely the sending of newsletters, information about our services, invitations to professional events, etc..)	Data of the contact persons within the organisations of Clients and Prospects (business email address, business telephone number, title, etc.).	For this purpose, the data is collected directly from you or indirectly from public sources
Management of Suppliers	Identification data of contact persons (business email address, business telephone number, title, etc.) and any information related to the intervention of the contact person in the contractual relationship.	For this purpose, the data is collected directly from you
Management of disputes and disputed facts/events (with our Clients and Suppliers)	Identification data of contact persons (business email address, business telephone number, title, etc.) and any other information related to the intervention of these contact persons in the disputed facts/event	For this purpose, the data is collected directly from you

4. Who do we share your personal data with?

We may share your personal data as part of our activities. Of course, we always do so in a way that will ensure optimal protection of your personal data.

- **With certain sub-contractors** such as suppliers of certain IT applications (such as, for example, hosting services) or marketing or communication bureau to allow our business relationships with our Clients to be managed in the best possible way, as well as our partners for due diligence and audit activities.
- **With our suppliers**, such as our auditors, lawyers, etc. for the requirements of the contractual relationship with them or for the management of disputes, if applicable, etc.
- **With public authorities**, in response to legal requests, including to meet national security requirements or for the application of the law (such as, for example, tax authorities, etc.).
- **As part of a transaction**, such as a merger, acquisition, consolidation or sale of assets, we may be required to share your personal data with the buyers or sellers.

5. How long do we keep your personal data?

LABEL R has set out precise rules regarding the storage period for your personal data. This period varies depending on the different purposes and has to take account of any legal obligations to keep some of your data.

Layer 1 To learn more, click on the following link

Purpose of the collection	Storage period
Management of the Client and Prospective Client relationship	10 years from the end of the contractual relationship
Marketing to our Clients and Prospects (namely the sending of newsletters, information about our services, invitations to professional events, etc..)	10 years
Management of suppliers	10 years from the end of the contractual relationship
Management of disputes and disputed facts/events (with our Clients and Suppliers)	10 years from the end of the disputed events or facts

6. What rights do you have regarding your personal data?

We would like to inform you as clearly as possible of your rights with regard to your personal data. The way to exercise your rights is explained in point 7.

Please find below a summary of your rights

A. Right of access

You can ask us to grant you access to all the following information regarding:

- the categories of personal data concerned;
- the purposes of the processing;
- the categories of people with whom we share or will share your personal data and in particular those who are located outside Europe;
- the duration for which your personal data will be kept in our systems;
- your right to ask us to correct or delete your personal data or to limit the use that we make of your personal data and your right to oppose to this use;
- your right to lodge a complaint with a European data protection authority;

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- information regarding the source, when we have not collected your personal data directly from you;
- the way in which your personal data are protected when they are transferred to countries outside Europe.

B. Right to rectification

You can ask LABEL R to correct and/or update your personal data.

C. The right to erasure (“right to be forgotten”)

You can contact us at any time to ask us to delete the personal data that we process about you, if one of the following situations applies to you:

- Your personal data are no longer necessary for the reasons for which they were collected or processed;
- You have withdrawn your consent, which is the ground for LABEL R to process your personal data;
- Because you believe, for a specific reason, that further processing would adversely affect your privacy and could cause excessive damage;
- You no longer wish to receive commercial proposals from us;
- Your personal data are not processed in accordance with the GDPR and the applicable national regulations;
- Your personal data have to be deleted to fulfil a legal obligation laid down in the law of the European Union or the national law to which LABEL R is subject;

Our website may contain personal data that concern you. If you do not wish these data to appear on the website, you can ask us to remove them if you are in one of the situations described above.

However, we may be unable to respond to your request to exercise your right to be forgotten. It is important to remember that this right is not absolute. We have to ensure that this right is balanced against other important rights and values, such as freedom of expression, compliance with a legal requirement to which we are subject or important reasons of public interest.

D. The right to object

The applicable legislation gives you the right to object, at any time for a reason particular to you, to the processing of your personal data. Indeed, if you believe that such processing is infringing on your privacy and/or causing you excessive damage, you may use this right.

You can, in particular, object to the use of your personal data for marketing purposes (cf. above) and, in particular, email advertising.

However, under no circumstances may you prevent us from processing your data:

- if the processing is necessary for the entering into or performance of your contract;
- if the processing is required by law or a regulation;
- if the processing is required to record, exercise or defend the rights in court.

E. The right to data portability (layer 1)

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Data portability gives you a chance to control your personal data yourself more easily and more precisely to:

- Recover your personal data, which are being processed by us, for your personal use and to store them on a device or in a private cloud storage, for example
- Transfer your personal data from us to another company, either by you or directly by us, provided that a direct transfer is “technically possible”.

This right concerns your data that have been actively and knowingly declared, and the information collected by LABEL R.

Conversely, the personal data that are derived, calculated or inferred from the data that you have provided, are excluded from the right to data portability if they were created by LABEL R.

However, you should know that LABEL R has the right to refuse your data portability request. This right only applies to personal data that were collected based on your consent or the performance of a contract concluded with you. Moreover, this right may infringe the rights and freedoms of third parties, whose data may form part of the data which would be transferred as a consequence of the request to portability.

F. The right to restriction of processing

You have the right to ask us to restrict the processing, which involves the tagging (for example, temporarily moving your data to another processing system or locking your data, making them inaccessible) of your personal data, in order to restrict their further processing. You may exercise this right when:

- the accuracy of the data in question is disputed;
- your personal data is not processed in accordance with the GDPR and national law;
- the data is no longer needed for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
- the decision regarding your objection to the processing is pending.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

In case of restriction of processing of some of your personal data, we will keep you informed before the restriction of processing is lifted.

7. How can you exercise your rights?

If you want to exercise your rights, simply send an email to label-r@label-r.com indicating in the subject field the right you want to exercise. Please attach a copy of your ID card. Please be aware that it is important to indicate the reasons behind your request.

You can also exercise your rights by writing to us at the following address label-r@label-r.com. Your written request must be signed and accompanied by a photocopy of your ID card. The request must specify the address to which the response should be sent.

A response will then be sent to you within one (1) month following receipt of the request or two (2) more months if the request necessitates further research or if LABEL R receives a very high number

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of requests. If your request is not clear or does not contain everything to allow us to proceed with the operations requested, we will ask you, within this period, to provide us more information.

8. Would you like to contact us about this Charter on the protection of your personal data and/or would you like to lodge a complaint with a data protection authority?

Do you have a question or a suggestion about this Charter on the protection of your personal data?

If so, do not hesitate to contact us by sending an email to label-r@label-r.com or by sending a letter to our postal address.

We will be pleased to read your message and reply as soon as possible.

Do you think we do not protect your personal data sufficiently?

If you believe that LABEL R is not processing your personal data, please let us know by contacting us here label-r@label-r.com or by post.

If you are not satisfied with our answer, you have the right to lodge a complaint with a national data protection authority, for example The National Commission for Data Protection of the Grand-Duchy of Luxembourg.

9. How will you know if this personal data protection charter has been amended?

This Charter on the protection of your personal data may be modified at any time, in particular to take account of any legal or statutory changes and the development of our services.

Any major changes that may be made will be announced via our website.