

Privacy Statement

Introduction

At ATWELL, we take your privacy seriously. This Privacy Statement explains how we collect, use, and protect your personal data when you interact with our website, services, or engage with us in any other capacity. We are committed to complying with the Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the General Data Protection Regulation or “GDPR”), hereinafter collectively referred to as “*Data Protection Legislation*” and ensuring the security of your personal data.

1. Data Controller

The data controller responsible for the processing of your personal data is:

ATWELL

Address: 33, rue de Gasperich, L-5826 Hesperange

Phone number: +352 27 21 64 – 1

Email address: data@atwell.lu

Website: <http://www.ATWELL.lu>

2. Types of Personal Data We Collect

We collect the following types of personal data, depending on how you interact with us:

- **Contact Information:** Name, address, email address, phone number.
- **Web Analytics Data:** Operating system, browser type and other technical data automatically collected when you visit our website.
- **Communication Data:** Any personal data you provide when communicating with us via email, phone, or our contact form.

3. Purpose of Processing Your Data

We process your personal data for the following purposes:

- To provide our professional services to you (audit, valuation, regulatory, etc.).

- To manage and respond to inquiries, requests, or complaints submitted through our website.
- To improve the content and functionality of our website.
- To comply with legal and regulatory obligations, including those related to anti-money laundering, audit, and financial reporting requirements.

4. Legal Basis for Processing

We process your personal data on the following legal bases under the GDPR:

- **Consent:** When you provide us with explicit consent (e.g., filling out a contact form).
- **Contractual Necessity:** To perform our services and respond to your inquiries.
- **Legal Obligation:** To comply with applicable legal and regulatory requirements. As described in our Legal Notice
- **Legitimate Interests:** For our legitimate business interests, such as improving our website and services.

5. Sharing Your Personal Data

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

- **Third-party service providers** who assist us in delivering our services (e.g., IT service providers, cloud hosting providers, etc.).
- **Legal and regulatory authorities** were required to comply with our legal obligations.

We ensure that these third parties comply with GDPR requirements and provide adequate safeguards for your personal data.

6. Retention of Your Data

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected or as required by law.

7. Your Rights Under GDPR

Under the GDPR, you have the following rights regarding your personal data:

- **Right to Access:** You have the right to request a copy of your personal data that we hold.

- **Right to Rectification:** You can request the correction of inaccurate or incomplete data.
- **Right to Erasure:** You may request the deletion of your personal data under certain conditions.
- **Right to Restriction of Processing:** You can request the restriction of processing of your personal data under certain conditions.
- **Right to Data Portability:** You may request a copy of your personal data in a structured, commonly used format.
- **Right to Object:** You can object to the processing of your personal data for specific purposes.

To exercise any of these rights, please contact us at data@atwell.lu

8. Data Security

We are committed to ensuring that your personal data is secure. We implement robust technical and organizational measures to protect your data from unauthorized access, loss, or alteration. While no system is completely immune to risks, we work hard to minimize potential threats and ensure that your data remains safe throughout its lifecycle. If you have any concerns about how your data is handled, please don't hesitate to reach out to us.

9. Cookies

Our website uses cookies to improve the user experience and analyze website traffic. For more information about our use of cookies, please refer to our [COOKIES](#)

10. International Transfers

If your personal data is transferred outside of the European Economic Area (EEA), we ensure that adequate safeguards are in place to protect your data, in accordance with GDPR requirements (e.g., through standard contractual clauses or other mechanisms) – Art. 46 GDPR (Transfers to third countries).

11. Changes to This Privacy Statement

We may update this Privacy Statement from time to time to reflect changes in our practices or legal obligations. Any changes will be posted on this page with the updated date. We encourage

you to review this statement periodically to stay informed about how we protect your personal data.

12. Contact Information

If you have any questions or concerns about this Privacy Statement or our data processing practices, please contact us at:

ATWELL

33, rue de Gasperich, L-5826 Hesperange

Email address: data@atwell.lu

You also have the right to lodge a complaint with the Luxembourg Data Protection Authority (CNPD) if you believe your data protection rights have been violated. [Commission nationale pour la protection des données - Luxembourg](#)