

DPN-02-06-01-EN

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PRIVACY NOTICE WEB/COOKIES

1. WEBSITE/COOKIES

- 1.1 **Legal owner.** This website is the property of and is operated by LUXEMBOURG AIR RESCUE ASBL (LAR), Luxembourg Airport, L-1110 Findel GRAND-DUCHY OF LUXEMBOURG.
- 1.2 **Contact details.** LAR can be contacted at this address: [info@lar.lu].

2. PRIVACY POLICY

- 2.1 DATA PROCESSING. LAR collects and processes personal data (**Personal Data**) on users of this website, as well as on individuals who use our site to become a member, or purchase items in our online shop. LAR is the controller in respect of the processing of such data. LAR is committed to respecting your privacy and protecting your personal data in accordance with the law, in particular the EU General Data Protection Regulation 2016/679 (**GDPR**).
- 2.2 DATA PROTECTION OFFICER. LAR Group has appointed a data protection officer (**DPO**), who can be contacted at dpo@lar.lu
- 2.3 PERSONAL DATA. The type of Personal Data we process depends on how you interact with us and/or which services of ours you are using.

The categories of Personal Data we collect may include:

- a. Automatic collection of Personal Data. Generally, our intent is to collect only the personal information that is provided voluntarily by online visitors so that we can offer information and/or services to those individuals (notably through your subscription to our newsletter) or offer information about e.g. employment opportunities, or service those who purchase items in our online shop. Besides information you provide to us on a voluntary basis, we may also collect Personal Data through your system/device and use of our website (notably through cookies; 3 Cookies) such as information about your IP address, browser type and version, operating system and browsing activity.
- 2.4 PURPOSES. We process your Personal Data for the following purposes:
 - a. for the provision of services or information requested by you,
 - b. to send you our newsletter or other related communications (e.g., events, campaigns),
 - c. to manage our relationship with you,
 - d. to provide you with a safe and comfortable experience when visiting our website,
 - e. to manage or improve our website and services provided by us.
 - f. for the establishment, exercise or defence of legal claims.
- 2.5 LEGAL BASIS. The processing of your Personal Data is based on the following grounds:

VIA RESCUE

LAR GROUP DATA PROTECTION

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- a. to take steps at your request prior to entering into a contract (where your apply for becoming a member, subscribe to services) or for the performance of a contract with you (where you are a member and we deliver the services you have requested, or where you order items in our online shop),
- b. for compliance with legal obligation to which we are subject (for instance, if you are a member and use our services, for the processing related to invoicing, accounting and other mandatory operations),
- c. for our legitimate interests (such as, manage our operations and service delivery conditions, manage members' and donators' relations and donations, promote our services and organisation, manage subscriptions to our newsletter and other publications or events, improve our website and services, collect metrics and statistics on your use of our website), or with your consent.
- 2.6 DATA RECIPIENTS. LAR Group may share your Personal Data internally, with other entities of our group, third-party partners/service providers as necessary to perform our operations and deliver services to you, where required by law, competent local authorities.
- 2.7 DATA TRANSFERS OUTSIDE THE EU/EEA. We do not transfer your Personal Data outside the EU/EEA for our internal recruitment process. However, if a specific situation requires to transfer Personal Data to a recipient outside of the EU/EEA, you should be aware that, in general, legal protection for personal data in countries outside the EU/EEA may not be equivalent to the level of protection in the EU/EEA. However we take steps to put in place suitable safeguards to protect your Personal Data, such as entering into EC approved standard contractual clauses. Further information on such safeguards can be obtained by contacting our DPO: dpo@lar.lu.
- 2.8 DATA RETENTION. We will retain your Personal Data for as long as required to manage your membership, deliver our services, and then for the mandatory retention duration set forth by applicable law (up to 10 years from the end of our contractual relationship where applicable; as regards technical data collected during your use of our website, for a maximum period of time of 6 months from the date of their collection, as required by CNPD and by analogy with rules applicable to the retention of traffic data.
- 2.9 CHILD PRIVACY: We understand the importance of protecting children's privacy. Our Website and services are not designed for, or intentionally targeted at, children. It is not our policy to intentionally collect or store personal data about children. If we need to process personal data that pertain to children, in the context of any event or activity we might organize or service we may offer, you shall be informed appropriately.
- 2.10 DATA SECURITY AND INTEGRITY: LAR has reasonable security policies and procedures in place to protect personal information from unauthorized loss, misuse, alteration, or destruction. Despite LAR's best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of our ability, access to your personal information is limited to those who have a need to know. Those individuals who have access to the data are required to maintain the confidentiality of such information.



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3. COOKIES

In some instances, LAR uses cookies, web beacons and other technologies to automatically collect certain types of information when you visit us online, as well as through emails that we may exchange. The collection of this information allows us to customize our online experience, improve the performance, usability and effectiveness of LARs online presence, and to measure the effectiveness of our marketing activities.

3.1 WHAT ARE COOKIES?

In order to provide you with a more personalized and responsive service we need to remember and store information about how you use this Website. This is done using small text files called cookies. Cookies contain small amounts of information and are downloaded to your computer or other device by a server for this Website. Your web browser then sends these cookies back to this Website on each subsequent visit so that it can recognize you and remember things like your user preferences. You can find detailed information about cookies and how thev http://www.aboutcookies.org/. Whenever you use this Website, information may be collected through the use of cookies and other technologies. By using this Website you agree to our use of cookies as described in this Notice.

3.2 TYPE OF COOKIES

- a. **Strictly necessary cookies.** Some of the cookies we use are necessary to enable you to move around our Website and use its features such as accessing secure areas that may contain content for registered users.
- b. **Functional cookies**. We also use functional cookies to record information about the choices you have made and to allow us to tailor the site to our users; for example, to remember your language or region or that you have already completed a survey. This information is usually anonymised and is not used for any other purpose.
- c. Analytics cookies. LAR uses Google Analytics. More information about how Google Analytics is used by LAR can be found here: http://www.google.com/analytics/learn/privacy.html. To provide web site visitors with more choice on how their data is collected by Google Analytics, Google have developed the Google Analytics Opt-out Browser Add-on. The add-on communicates with the Google Analytics JavaScript (ga.js) to indicate that information about the web site visit should not be sent to Google Analytics. The Google Analytics Opt-out Browser Add-on does not prevent information from being sent to the web site itself or to other web analytics services.

We or our service providers also use analytic services to help us understand how effective our content is, what interests our users have, and to improve how this Website works. In addition, we use web beacons or tracking pixels to count visitor numbers and performance cookies to track how many individual users access this Website and how often. This information is used for statistical purposes only and it is not our intention to use such information to personally identify any user. However, if you have registered and signed into this Website we may combine this



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information with information from our web analytic services and cookies to analyse how you use this Website in more detail.

- d. This Website does NOT use Targeting Cookies to deliver targeted advertising to Website visitors.
- e. **Social media cookies**: We may use 'social buttons' to enable our users to share or bookmark web pages of this Website via their social network and users may be connected with their social network such as Facebook, LinkedIn, Twitter, Google+ when consulting this Website. In these cases, these sites may log information about your activities on the Internet including on this Website. Please review the respective terms of use and privacy policies of these sites to understand exactly how they use your information and to find out how to opt-out, or delete, such information.
- f. **External web services**: We may sometimes use external web services on this Website to display content within the web pages of this Website, for example to display images, show videos or run polls. As with the social buttons, we cannot prevent these sites, or external domains, from collecting information on your use of this embedded content.
- g. Email Communications/tracking technologies: We may also use tracking technologies (Cookies) to determine whether you have read, clicked on, or forwarded certain email communications we send to you so that we can make our communications more helpful and interesting. If you do not wish us to confirm whether you have opened, clicked on or forwarded our communications, you will need to unsubscribe, as it is not possible for us to send these emails without tracking enabled. Registered subscribers can update their communication preferences at any time by contacting us, or you can unsubscribe following the instructions in the individual email communications you receive from us.
- 3.3 HOW TO CONTROL COOKIES? By using this Website you expressly agree that we can place cookies on your computer or device as explained above and in accordance with your selected cookies preferences. Please bear in mind that removing or blocking cookies can impact on your user experience and parts of this Website may no longer be fully accessible.
 - a. Browser controls: Most browsers will allow you to see what cookies you have and delete them on an individual basis or block cookies from particular or all websites. Be aware that any preference you have set will be lost if you delete all cookies, including your preference to opt-out from cookies as this itself requires an opt-out cookie to have been set. For more information on how to modify your browser settings to block or filter cookies, see http://www.cookiecentral.com/faq/.
 - b. Managing Analytics cookies: You can opt-out of having your anonymised browsing activity within websites recorded by analytics cookies. We use the following service providers and you can learn more about their privacy policies and how to opt-out of their cookies by clicking on following links:

Adobe: http://www.adobe.com/privacy/opt-out.html

Google Analytics: http://www.google.com/analytics/learn/privacy.html



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- c. Managing Local Shared Objects or Flash Cookies: A local shared object or flash cookie is like most other browser cookies except that it can store additional types of information. These cookies cannot be controlled using the mechanisms listed above. Some parts of this Website use these types of cookies to store user preferences for media player functionality and without them some video content may not play properly. These cookies can be controlled manually by visiting the Adobe website. http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_m anagero7.html
- 3.4 YOUR STATUTORY RIGHTS. You have certain rights concerning your Personal Data as mentioned below, and can exercise them by contacting our DPO at:
 - a. **Access right.** You have the right to access your Personal Data. We process a large quantity of information, and can thus request, in accordance with the law, that before the information is delivered, you specify the information or processing activities to which your request relates.
 - b. **Right to rectification**. You can ask us to rectify, correct or update inaccurate and/or incorrect data;
 - c. **Other rights**. In certain limited cases (in which case we will analyse whether the conditions for the exercise of such rights are fulfilled, in line with the law), you may object to, or request the limitation of, the processing of your Personal Data, or request the erasure or portability of your Personal Data. You should note that the law authorizes us to retain and continue processing certain Personal Data, even where you have exercised your rights to object or erasure, for legitimate and compelling reasons such as compliance with applicable law. Finally, you can contact the Luxembourg data protection authority: *Commission nationale pour la protection des données (CNPD)* to introduce a claim.
- 3.5 CHANGES TO THE POLICY. Changes may occur in the way we process Personal Data. This Privacy Policy will be updated to reflect these changes. The revision number and the date are recorded on this page. All changes become effective when a new update is posted unless indicated otherwise. Thus, we encourage you to check this page regularly.
- 3.6 TRANSLATION. These present legal notes are written in French, English and German but only the French version will be decisive in cases of litigation.