

# Privacy Policy

Last updated on 05/12/2025

The purpose of the present privacy policy ("**the Privacy Policy**") is to provide you with information on the use of personal data, in accordance with the provisions of the EU General Data Protection Regulation n° 2016/679 of the European Parliament and of the Council 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 (the "GDPR") and any applicable national data protection laws (including but not limited to the Luxembourg law of 1<sup>st</sup> August 2018 organizing the National Commission for data protection and the general system on data protection, as amended from time to time) (collectively hereinafter the "Data Protection Laws"). This Notice also reflects recent regulatory guidance, including those issued by European Data Protection Board (EDPB), and takes into account emerging technologies such as secure AI tools.

Personal data is any type of information, regardless of its medium, including sound and image, relating to an identified or identifiable natural person (the "**data subject**"). For the purposes of the present Privacy Policy, the term "personal data" and/or "data" shall refer to any personal data that **Maître DANOIS ("we")** collects or otherwise processes.

Within the course of its business, and in order to ensure effective operations of her services, we process personal data within the meaning of the **GDPR**.

In this regard, when acting as a data controller of your personal data, we are highly committed to safeguarding your privacy.

This **Privacy Policy** provides information on how we may collect, use, share, protect and retain your information, as well as your rights regarding it.

## 1. Who we are - data controller

**Maître Clara DANOIS** ("we," "us," or "our") is the data controller with respect to your personal data processing.

### Contact details:

Maître Clara DANOIS

Infuero Law Firm  
21 rue Glésener  
L-1631 Luxembourg  
Grand Duchy of Luxembourg  
Email: [cd@infuero.lu](mailto:cd@infuero.lu)  
Website: <https://maitredanoisclara.com>

As a data controller, we are responsible for determining "how" and "why" your personal data is processed, in accordance with the requirements of the GDPR. This means we are responsible for collecting, processing, and safeguarding your personal data in a lawful, fair, and transparent manner.

## 2. What personal data we collect

To provide our legal services and operate our website, we collect and process various categories of personal data. The data we collect depends on the context of your interactions with us and the services we provide.

### 2.1. Identification Data

- First name and last name
- Email address
- Postal address

- Telephone number
- Date and place of birth
- Gender
- Nationality
- Country of residence
- Preferred language

## **2.2. Professional and Business Information**

- Job function and title
- Department and organization name
- Organization size and location
- Business contact information
- Information about whether you are acting on behalf of a client or organization

## **2.3. Financial Information**

- Bank account details
- Payment card information
- Financial transaction records
- Billing and invoicing information

## **2.4. Contractual and Legal Information**

- Contract details and documentation
- Information related to legal matters and mandates
- Correspondence and communications
- Documents provided in the context of legal services
- Information related to anti-money laundering (AML) and know-your-client (KYC) obligations

## **2.5. Electronic Identification Data**

- IP address
- Browser type and version
- Device information
- Cookie data and website usage information
- Pages visited and time spent on our website
- Referral sources

For detailed information about cookies and similar technologies, please refer to our Cookie Policy.

## **2.6. Third-Party Information**

In certain circumstances, you may provide us with personal data about third parties (e.g., opposing parties, witnesses, beneficial owners, family members, representatives, or other individuals relevant to your legal matter). When you do so, you must ensure that these individuals are informed about our processing activities as described in this Privacy Policy.

## **3. How and why we process your data**

We process your personal data for specific purposes and only when we have a valid legal basis to do so under Article 6 of the GDPR.

### **3.1. Legal Bases for Processing**

We process personal data based on one or more of the following legal grounds:

- a) **Contractual Necessity**  
Processing is necessary to perform a contract with you or to take steps at your request before entering into a contract.

**Purposes:**

- Providing legal services and advice
- Managing client relationships
- Executing legal mandates
- Processing payments and invoicing
- Communicating about legal matters

**b) Legal Obligation**

Processing is necessary to comply with legal obligations to which we are subject.

**Purposes:**

- Compliance with Luxembourg Bar Association regulations
- Anti-money laundering (AML) and counter-terrorist financing (CTF) obligations
- Know-your-client (KYC) verification procedures
- Tax and accounting obligations
- Responding to requests from competent authorities
- Conflict of interest checks
- Professional liability and insurance requirements

**c) Legitimate Interests**

Processing is necessary for our legitimate interests or those of a third party, provided your interests and fundamental rights do not override those interests.

**Purposes:**

- Managing and improving our website
- Direct marketing and business development (where you have not objected)
- Fraud prevention and security
- IT system administration and security
- Internal business administration
- Statistical analysis and business intelligence
- Defending or establishing legal claims
- Managing professional relationships

**d) Consent**

You have given explicit consent for specific processing activities.

**Purposes:**

- Marketing communications (newsletters, updates)
- Use of certain cookies and tracking technologies
- Processing sensitive data where required

You have the right to withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

**3.2. Processing of Special Categories of Data**

In certain legal matters, we may need to process special categories of personal data (sensitive data) as defined in Article 9 of the GDPR, such as:

- Health data

- Data revealing racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic or biometric data
- Data concerning sex life or sexual orientation
- Criminal convictions and offenses

We only process such data when:

- You have given explicit consent
- Processing is necessary for the establishment, exercise, or defense of legal claims
- Another exemption under Article 9(2) GDPR applies

## **4. SOURCES OF PERSONAL DATA**

We obtain personal data from various sources:

### **4.1. Directly from You**

Most personal data is obtained directly from you when you:

- Contact us or request our services
- Enter into a contract with us
- Visit our website or use our online services
- Communicate with us by email, phone, or in person
- Provide documents and information in the context of a legal mandate

### **4.2. Indirectly from Third Parties**

We may also obtain personal data indirectly from:

- Your organization, employer, or representative
- Opposing parties or their legal representatives
- Third parties involved in legal matters (witnesses, experts, etc.)
- Public registers and databases (e.g., Luxembourg Trade and Companies Register)
- Professional networks (e.g., LinkedIn)
- Government authorities and regulatory bodies

When we receive personal data from third parties, we take reasonable steps to ensure that those third parties have informed you about our processing activities or obtained any necessary consents.

## **5. Who we share your data with**

We may share your personal data with the following categories of recipients when necessary for the purposes described in this Privacy Policy:

### **5.1. Service Providers and Processors**

We engage trusted third-party service providers who process personal data on our behalf, including:

- IT service providers (hosting, cloud storage, email services)
- Website analytics providers
- Payment processors
- Professional advisors (accountants, auditors, insurance providers)
- Document management and archiving services
- Marketing and communication platforms

All processors are bound by data processing agreements and must process personal data only in accordance with our instructions and applicable data protection laws.

## **5.2. Professional and Legal Obligations**

We may share personal data with:

- Courts, tribunals, and judicial authorities
- Regulatory bodies (e.g., Luxembourg Bar Association, CNPD)
- Law enforcement and government agencies
- Opposing parties and their legal representatives
- Expert witnesses and consultants
- Notaries and bailiffs
- Other legal professionals involved in your matter

## **5.3. Third Parties in Specific Circumstances**

- Banks and financial institutions (for payment processing)
- Insurance companies (for professional liability purposes)
- Credit reference and fraud prevention agencies
- Prospective buyers or investors (in the event of a business sale or restructuring)

## **5.4. With Your Consent**

In certain circumstances, we may share your data with other third parties where you have given your explicit consent.

We do not sell, rent, or trade your personal data to third parties for their marketing purposes.

## **6. International transfers**

### **6.1. Transfers outside of the EU/EEA**

Your personal data is primarily processed and stored on servers located within the European Union (EU) or European Economic Area (EEA).

However, some of our service providers may be located outside the EU/EEA. When we transfer personal data to countries outside the EU/EEA, we ensure that appropriate safeguards are in place, such as:

- Standard Contractual Clauses (SCCs) approved by the European Commission
- Adequacy decisions by the European Commission recognizing that a country provides adequate data protection
- Other mechanisms permitted under the GDPR

### **6.2 Current Third-Party Services**

We currently use the following service that may involve transfers outside the EU/EEA:

#### **Google Analytics (Google LLC, United States)**

We use Google Analytics to analyze website traffic and user behavior. Google Analytics may transfer personal data to the United States. Google has implemented Standard Contractual Clauses (SCCs) and additional safeguards to ensure adequate protection of personal data transferred outside the EU/EEA. For more information, see Google's privacy policy: <https://policies.google.com/privacy>

You can opt out of Google Analytics tracking by using the Google Analytics Opt-out Browser Add-on available at: <https://tools.google.com/dlpage/gaoptout>

#### **Website Hosting (HOSTINGER INTERNATIONAL LIMITED, Cyprus)**

Our website is hosted by Hostinger International Limited, located in Cyprus. As Cyprus is a member of the European Union, personal data processed by our hosting provider remains within the EU/EEA and benefits from GDPR protection.

You may request further information about the specific safeguards we have put in place for international transfers by contacting us at [cd@infuero.lu](mailto:cd@infuero.lu).

## **7. Use of Social Networks**

We maintain a presence on social media platforms such as LinkedIn. When you interact with us on these platforms, your personal data may be processed by us and by the social network provider.

We may act as a joint data controller with social networks for certain processing activities, particularly when our social network logo appears on our website or when we use social network plugins.

### **Social Network Privacy Policies:**

**LinkedIn:** <https://www.linkedin.com/legal/privacy-policy>

We process personal data collected through social networks based on our legitimate interest in marketing, improving our brand image, and communicating with clients and prospects.

You can control what information social networks share with us through your privacy settings on those platforms.

## **8. How long we keep your data**

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected and to comply with legal, regulatory, and professional obligations.

### **8.1. General Retention Periods**

#### **Client Files and Legal Matters:**

- 10 years from the end of the mandate (in accordance with Luxembourg Bar Association regulations and professional liability requirements)
- Longer periods may apply for specific legal matters or where required by law

#### **Financial and Accounting Records:**

- 10 years from the end of the financial year (in accordance with Luxembourg tax and accounting laws)

#### **AML/KYC Documentation:**

- 5 years after the end of the business relationship (in accordance with AML legislation)

#### **Marketing Communications:**

- Until you withdraw consent or object to processing
- Maximum 3 years of inactivity for prospective clients

#### **Website Analytics :**

- As specified in our Cookie Policy (1 year and 1 month)

#### **Correspondence and Communications:**

- Duration of the business relationship plus applicable retention period for the matter

## **8.2. Criteria for Determining Retention Periods**

When determining retention periods, we consider:

- The nature and sensitivity of the data
- Legal and regulatory requirements
- Professional obligations and ethical rules
- Limitation periods for legal claims
- Legitimate business needs
- Your expectations and requests

## **8.3. Deletion and Anonymization**

After the applicable retention period expires, we will:

- Securely delete or destroy personal data, or
- Anonymize the data so that it can no longer be linked to you

## **9. Your data protection rights**

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

### **9.1. Right of Access**

You have the right to obtain confirmation as to whether we are processing your personal data and, if so, to access that data and receive information about:

- The purposes of processing
- The categories of data concerned
- The recipients or categories of recipients
- The retention period
- Your other rights

### **9.2. Right to Rectification**

You have the right to request that we correct inaccurate or incomplete personal data about you without undue delay.

### **9.3. Right to Erasure**

You have the right to request that we delete your personal data in certain circumstances, such as when:

- The data is no longer necessary for the purposes for which it was collected
- You withdraw consent and there is no other legal basis for processing
- You object to processing and there are no overriding legitimate grounds
- The data has been unlawfully processed

This right is subject to exceptions, particularly where we must retain data to comply with legal obligations or to establish, exercise, or defend legal claims.

### **9.4. Right to Restriction of Processing**

You have the right to request that we restrict processing of your personal data in certain circumstances, such as when:

- You contest the accuracy of the data
- The processing is unlawful but you oppose erasure
- We no longer need the data but you need it for legal claims
- You have objected to processing pending verification of our legitimate grounds

### **9.5. Right to Data Portability**

Where processing is based on consent or contract and carried out by automated means, you have the right to:

- Receive your personal data in a structured, commonly used, and machine-readable format
- Transmit that data to another controller without hindrance

### **9.6. Right to Object**

You have the right to object at any time to processing of your personal data based on legitimate interests or for direct marketing purposes.

Where you object to processing for direct marketing purposes, we will stop processing your data for those purposes immediately.

For other objections, we will assess whether we have compelling legitimate grounds that override your interests, rights, and freedoms.

### **9.7. Right to Withdraw Consent**

Where processing is based on your consent, you have the right to withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing before withdrawal.

### **9.8. Right Not to Be Subject to Automated Decision-Making**

You have the right not to be subject to decisions based solely on automated processing, including profiling, which produce legal effects or similarly significantly affect you.

We do not currently carry out automated decision-making or profiling. Should this change in the future, we will update this Privacy Policy and implement appropriate safeguards.

### **9.9. Right to Lodge a Complaint**

If you believe that your data is being processed in a manner that does not comply with the GDPR, you have the right to lodge a complaint with a supervisory authority.

#### **Luxembourg Supervisory Authority:**

Commission Nationale pour la Protection des Données (CNPd)

Address: 15, Boulevard du Jazz, L-4370 Belvaux, Luxembourg

Telephone: (+352) 26 10 60-1

Website: <https://cnpd.public.lu/>

### **9. 10. How to exercise your rights**

To exercise any of these rights, please contact us using the details provided in Section 13 "How to Contact Us."



We will respond to your request without undue delay and in any event within one month of receipt. In complex cases, this period may be extended by a further two months, and we will inform you of the extension.

We may need to verify your identity before responding to your request to ensure the security of your personal data.

## **10. How we protect your data**

We take the security of your personal data seriously and are committed to protecting it by design and by default.

### **10.1. Technical and Organizational Measures**

We maintain appropriate technical and organizational security measures to protect personal data against:

- Unauthorized or unlawful access
- Accidental loss, destruction, or damage
- Alteration, disclosure, or misuse

These measures include:

- Encryption of personal data in transit and at rest
- Secure password policies and multi-factor authentication
- Access controls and user authentication
- Regular security assessments and vulnerability testing
- Firewall and anti-malware protection
- Secure backup and disaster recovery procedures
- Incident response and breach notification procedures

### **10.2. Data Location**

Personal data is exclusively hosted on servers located in:

- The European Union (EU) or European Economic Area (EEA), or
- Countries deemed to provide an adequate level of data protection by the European Commission

### **10.3. Third-Party Security**

We carefully select and regularly review our service providers to ensure they provide appropriate security measures for personal data processing. All processors are bound by data processing agreements that require them to implement appropriate security measures.

## **11. What do we expect from you ?**

### **11.1 Keeping your information up to Date**

You must inform us in writing and without undue delay of any changes to the personal data you have provided, so that we can keep it accurate and up to date.

### **11.2 Providing third- Party information**

If you provide us with personal data relating to someone else (e.g., family members, beneficial owners, shareholders, representatives, witnesses, opposing parties, or any other third party), you must:

- Inform those individuals that you are providing their personal data to us
- Ensure they understand how we will use their data as described in this Privacy Policy
- Provide them with a copy of this Privacy Policy or direct them to our website
- Where required by law, obtain their explicit consent for us to process their personal data
- Ensure you are authorized to share their personal data with us

By providing us with third-party personal data, you confirm that:

- You are authorized to disclose that information to us
- The individuals concerned have been appropriately informed
- Where required, you have obtained their consent for the processing described in this Privacy Policy

### **11.3. Accuracy of Information**

You are responsible for ensuring that the information you provide to us is accurate, complete, and not misleading. Providing false or misleading information may affect our ability to provide services and may have legal consequences.

## **12. Changes to this Privacy Policy**

We reserve the right to update or modify this Privacy Policy from time to time to reflect:

- Changes in the law or regulatory requirements
- Changes in our data collection and processing practices
- New technologies or business practices
- Feedback from supervisory authorities or best practices

When we make changes to this Privacy Policy, we will:

- Update the "Last updated" date at the top of this policy
- Post the revised version on our website
- Where changes are significant, we may notify you by email or through prominent notice on our website.

We encourage you to review this Privacy Policy periodically to stay informed about how we are protecting your personal data.

## **13. How to contact us**

If you have any questions, concerns, or requests regarding this Privacy Policy or our processing of your personal data, please contact us:

**Maître DANOIS Clara**

Infuero Law firm

21 rue Glésener, L-1631 Luxembourg Gare, Luxembourg

Email: [cd@infuero.lu](mailto:cd@infuero.lu)

Website: <https://maitredanoisclara.com>

This Privacy Policy was last updated on 05/12/2025.