



Alcor Executive Privacy and Personal Data Protection policy

This Privacy Statement explains how ALCOR EXECUTIVE may use, process and store your personal data.

1. How we acquire your data

ALCOR EXECUTIVE obtains your personal data in different ways

1) Personal data provided to ALCOR EXECUTIVE directly

We collect personal data directly from clients, prospective clients, business partners, beneficial owners, service providers, contracting parties, potential candidates and intermediaries within the framework of our activities, which include HR consultancy, advice and other services.

2) Personal data obtained from third parties

ALCOR EXECUTIVE also collects and processes personal data from publicly accessible sources such as internet, social networks or commercial registers. Furthermore ALCOR EXECUTIVE may receive personal data from third parties as part of the services ALCOR EXECUTIVE provides to you or in connection with legal requirements that are applicable to ALCOR EXECUTIVE

2. Why and how we process your personal data

The present section refers to data processing executed by ALCOR EXECUTIVE as a data controller, e.g. where ALCOR EXECUTIVE defines the purpose of the processing and is not acting in the name and for the account of another data controller.

ALCOR EXECUTIVE processes personal data for the purposes of providing human capital services and to comply with legal and regulatory obligations. ALCOR EXECUTIVE furthermore processes personal data for marketing purposes, to improve its website, and for social media activities.

When ALCOR EXECUTIVE processes personal data for its legitimate business interests, it will consider and balance any potential impact on the data subject and its rights under the relevant data protection laws. Whenever ALCOR EXECUTIVE processes personal data for these purposes the data subject has the right to object to this way of processing.

If the processing is solely based on consent, the data subject has the right to withdraw its consent. In this case ALCOR EXECUTIVE will cease any processing (except if legal obligations applying to ALCOR EXECUTIVE require a limited processing such as the storage of the data). The withdrawal of consent will not impact any processing executed in the past.

The following list, which is not exhaustive, provides an overview of the personal data that ALCOR EXECUTIVE processes:

- name (including initials), address, email address, telephone number, mobile number and other contact information
- date and place of birth
- nationality

- gender
- employment details (position or profession, company or organization);
- Resume, Curriculum Vitae
- interest areas
- marital status
- copies of identity documents (passport, national ID card, driver’s license, social security identification numbers)
- source of wealth

ALCOR EXECUTIVE may also collect and process other personal data when it is useful or necessary for the provision of its human capital services.

When executing mandates conferred by clients, ALCOR EXECUTIVE may act as a data processor with respect to data received from the client. In such cases, the processing to be executed by ALCOR EXECUTIVE will be regulated by the Terms & Conditions of ALCOR EXECUTIVE which take into account the requirements listed under article 28 of the GDPR.

3. Retention period

ALCOR EXECUTIVE will process and store the relevant personal data for the duration of its human capital services or for the duration of the business relationship. ALCOR EXECUTIVE may also store the data for as long as it is necessary or required in order to fulfill legal, contractual or statutory obligations, or for the establishment, exercise or defense of legal claims, and in general where it has a legitimate interest to do so. With regard to the time limitations provided for by article 2276 of the Luxembourg Civil Code, ALCOR EXECUTIVE may retain, but has no obligation to do so, the relevant personal data for a period of five (5) years after the termination of the services or the business relationship.

4. Your rights

You have the following rights:

(i) Access to your information: you have the right to access the personal information that ALCOR EXECUTIVE holds about you at any time.

(ii) Data portability: you may ask ALCOR EXECUTIVE to provide you with a copy of the personal information that ALCOR EXECUTIVE holds about you.

(iii) Correction of your personal information: you have the right to ask ALCOR EXECUTIVE to update and correct any out-of-date or incorrect personal information that we would hold about you.

(iv) Deletion of your personal information (the right to be forgotten): subject to article 2276 of the Luxembourg Civil Code, you have the right to ask ALCOR EXECUTIVE to delete your personal information, to the extent that ALCOR EXECUTIVE has no legal and/or regulatory obligations to keep such personal information.

(v) Restriction of processing of your personal information: you have the right to ask ALCOR EXECUTIVE to restrict the processing of your personal information in case:

a. You disputed the accuracy of the personal information held by ALCOR EXECUTIVE;



b. The processing is unlawful but you objected to the deletion of the personal data and request the restriction of the use instead;

c. ALCOR EXECUTIVE no longer needs the personal data for the purposes of the processing, but you require them for legal reasons;

d. You objected to processing and ALCOR EXECUTIVE is investigating whether there are legitimate grounds to override your objection.

(vi) Automatic decision making: ALCOR EXECUTIVE generally does not make decisions by purely automatic means, but if we do, you have the right to object.

(vii) Object

You have the right to object at any time to the processing of your personal data for any direct marketing (and related profiling) by ALCOR EXECUTIVE. At the end of each digital mailing that you receive from ALCOR EXECUTIVE, you can always change your mailing preferences by reply email expressing you no longer wish to receive mailings from us. In short, you can always withdraw your consent.

If you wish to exercise any of the above rights, you can contact ALCOR EXECUTIVE using the following email address: dpo@alcorexecutive.com.

In addition you have the right to make a complaint with the local supervisory authority with respect to the way ALCOR EXECUTIVE is processing your personal data or the way ALCOR EXECUTIVE is handling your rights.

5. Your personal data and third parties

ALCOR EXECUTIVE may disclose or transfer personal data collected by ALCOR EXECUTIVE to other companies or subcontractors, located within or outside of the European Economic Area, for the purpose of the proper performance of the human capital services ALCOR EXECUTIVE provides to its clients. ALCOR EXECUTIVE enters into data processing agreements with such subcontractors to ensure that they process your data, on our behalf, with the same level of security and confidentiality as applied by ALCOR EXECUTIVE. ALCOR EXECUTIVE may furthermore disclose or transfer personal data when we have received your consent to do so.

In addition, ALCOR EXECUTIVE may disclose or transfer personal data for compliance purposes and/or to protect its rights or those of its clients and/or to prevent fraud. ALCOR EXECUTIVE can also be obliged to disclose or transfer personal data to competent authorities in order to comply with its legal and/or regulatory obligations.

Except as described in this paragraph, ALCOR EXECUTIVE will not disclose, transfer or sell your personal data to any third party unless you have consented to this.

6. Protection of your personal data

ALCOR EXECUTIVE has taken appropriate technical and organizational measures to protect your personal data against loss or any form of unlawful processing.



7. Website

ALCOR EXECUTIVE is the controller of the data collected through its website (the "Website").

Visitors are not required to disclose their personal data as a condition of using the Website. However, when visitors register, request publications or other information, sign up for newsletters and/or conferences and events, apply for jobs, ALCOR EXECUTIVE collects personally-identifiable information. The personally-identifiable information collected may consist of information that you provide, such as names, mailing addresses, e-mail addresses, telephone and fax numbers, and, for recruiting purposes, any other personally-identifiable information on your resume.

The data will not be transmitted to third parties.

8. Changes to this privacy statement

ALCOR EXECUTIVE reserves the right and is entitled to change this privacy statement at any time and for any reason whatsoever. We advise you to periodically review this privacy statement available on the website www.alcorexecutive.com to be informed about how ALCOR EXECUTIVE is protecting your privacy.

9. Contact

If you have any questions, comments, concerns or complaints in relation to this Privacy Statement, ALCOR EXECUTIVE's processing of your personal data or if you wish to exercise any of your rights, please contact our Data Protection Officer via the following email: dpo@alcorexecutive.com.