

# **Privacy Policy**

This Privacy Policy defines and informs you of how VMC3 Sàrl uses and protects the information that you provide to us, if applicable, when you use this site accessible from the following URL: http://www.vmc3.lu (hereafter the "site").

By using our site, you agree to our Privacy Policy and the terms of use presented below.

The Privacy Policy refers to the collection and use of personal information that you provide to us through the use of our website.

We reserve the right, at our discretion, to modify or remove portions of this Privacy Policy at any time.

This Privacy Policy is in addition to all other terms and conditions applicable to our site.

The use of third-party sites (which may be linked to our website) is done under your responsibility. In this case, we invite you to consult the confidentiality and privacy policies of these third-party sites.

#### 1. Your personal data

During your visit to our site, you may be required to provide us with certain personal data relating to your identity (last name, first name) as well as your contact information (e-mail address and telephone number). The same applies when you submit requests or contact us.

The personal data that we are thus likely to collect and process is as follows:

- Your last name, first name, email address, phone number
- Your electronic information, such as your IP address
- Your preferences in terms of real estate searches

#### 2. Responsibility for processing your personal data

VMC3 Sàrl (hereafter 'we' or 'us'), informs you that, for the purposes stated below and in order to be able to provide its services, as well as to transmit information and contact requests relating to specific real estate listings through its website (hereafter jointly referred to as "services") and for the operation of said website, VMC3 SA processes personal data, provided by you or otherwise acquired during the performance of its services and/or during your browsing on this website, as the data controller.

#### 3. Duration of data retention

Your personal data will be kept by us for a period of 60 months from the end of the last commercial contact with our agency or for the legal period stated in a contract that may have been established with you.

# 4. Conditions under which your personal data is processed.

Processing of this data is done within the framework of appropriate procedures and measures to protect security in terms of integrity, confidentiality and accessibility of the user's data, in accordance with applicable legislation. The purpose of this data processing is to use said data, including collection, saving, organization, retention, update, selection, extraction, comparison, interconnection, blocking, communication, deletion or combination of two or more of the above activities, and is also intended for the performance of profiling based on preferences expressed during navigation on the site, within the limits necessary to pursue the purposes for which the data was collected.

### 5. Purposes of processing.

Your personal data is processed for purposes defined beforehand by us, namely:

- 5.1 The processing is necessary for the purpose of providing you with the information or services you have requested (a request for information about a real estate ad, a request for contact in order to establish a business relationship, ...), but also to collect information that allows us to improve our site, our products and services (notably through cookies). The nature of the services provided requires that data and information regarding the location, type and characteristics of the properties sought be communication to our company and undergo automated processing. This data and information, as well as its processing, are essential in order to satisfy and respond to your requests.
- 5.2 To satisfy any related obligation under applicable regulations.
- 5.3 If necessary, to exercise and/or defend a right with the competent authority.

#### 6. Legal basis for processing

The legal basis for processing your personal data, as specified in point 1 of the above purposes, is the need for our company to ensure performance of the contract to which you are a party as part of the request for service.

The processing of your personal data as indicated in point 2 of the above purposes, is based on the need to fulfil any obligation under the applicable law related to providing services.

The processing of your personal data referred to in point 3 of the above purposes is based on the legitimate interests of our company, the exercise and/or defence, if any, of your rights with the competent authorities.

#### 7. Nature of data disclosure and consequences of non-disclosure

The disclosure of your personal data and, as indicated, of your profile, is a necessary condition for the processing carried out for the above purposes.

Therefore, in the event of non-disclosure of your personal data and/or your objection to it, our company will not be able to provide the services or fulfil any associated obligations under applicable law.

Your data will be processed by persons designated by our company and who

perform functions related to this processing.

## 8. Security

We make every effort to ensure the security, integrity and confidentiality of the data and personal information transmitted on/through our Site and to prevent access to it by unauthorized third parties. To do this, we review and update our security measures based on current technologies. Unfortunately, no data sent over the Internet can be guaranteed to be completely secure.

In addition, our employees and contractors who provide services related to our information systems are required to respect the confidentiality of personal information held by us. However, we cannot be held responsible for events resulting from unauthorized access to your personal information.

## 9. Cookies

Cookies are small data files that can be sent from a website to the user's terminal (usually to the browser), where they are stored before being sent back to the site on the next visit. Cookies give information about the preferences of the person who visits the site. Thus, they are able to recognize and retain information, for example the choice of language, login information, pages visited, etc. A cookie cannot retrieve any other data from your device's hard drive, transmit computer viruses or acquire email addresses. The danger lies only in their ability to track the history of your browsing. Cookies can be used by both the site owner and third parties and can be easily disabled by you.

#### List of cookies :

<u>Cookies used by the subcontractor OVH SAS for website hosting:</u> SERVERID PHPSESSID

Cookies used by the subcontractor Google LLC for visit statistics:

\_gat\_gtag\_UA \_gld \_utmb \_utmt \_utmt \_utmz \_utma \_utmc plan

<u>Cookies used by the Website for navigation:</u> start startBAK cluster clusterBAK

## 10. Your rights and contacts

As a person concerned by the processing of your personal data by VMC3 through this website, you are able to exercise, at any time, the following rights:

- 10.1 The right to obtain confirmation of the existence or absence of personal data concerning you and, in this case, to obtain access to it and a copy of it. Except as otherwise provided by applicable law, VMC3 Sàrl may deny you the opportunity to obtain such a copy in the event that this would affect the rights and freedoms of others;
- 10.2 The right to obtain information about:
  - a. The origin of your personal data;
  - b. The purpose and manner of processing your personal data.
  - c. The logic applied in the case of processing using electronic instruments;
  - d. Identification details of the owner and, if named, the managers and privacy representative;
  - e. The persons or categories of persons to whom personal data may be communicated;
- 10.3 The right to obtain:
  - a. The update, rectification or integration of your personal data;
  - b. The deletion, anonymization or blocking of data processed in violation of the law, including that which does not have to be retained for the purposes for which the data was collected or further processed, in the cases specified by applicable law;
  - c. Limitation of the processing of your personal data in the cases specified by law;
- 10.4 The right to object, in whole or in part:
  - a. For legitimate reasons of processing personal data about you, although it is relevant for the purpose of collection;
  - b. To the processing of personal data concerning you for the purpose of sending materials for advertising or direct sales or for the performance of market research or commercial communication;
- 10.5 The right to:
  - a. Revoke your consent at any time, if it constitutes the legal basis for the processing, without prejudice to the legality of the processing based on consent before revocation;
  - b. Propose a complaint to the supervisory authority;
  - c. In the cases provided for by applicable law, receive your data in a structured format, of common use and readable by automated devices;
- 10.6 The right to obtain an attestation that each of the recipients to whom the personal data has been sent has been notified of any corrections, cancellations or

limitations of the processing, except in the case where this fulfilment is revealed or involves resorting to means that are clearly disproportionate to the protected right. In any case, at your express request, you will also be able to obtain the detail on these recipients.

For any request for contact or to exercise your rights relative to data protection, you may contact our services by email: info@vmc3.lu