

PRIVACY NOTICE



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Company registered with the Luxembourg Trade and Companies Register under number:
B236401

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PART ONE: Why is this Notice important to you?

1. Introduction

This Privacy Notice relating to the protection of personal data (hereinafter, the "**Privacy Notice**") is designed to inform you about the personal data relating to you processed by WAVES S.à r.l., acting as data controller (hereinafter, **WAVES, we, our**, as the case may be), whose registered office is located 9, Rue du Laboratoire, 1911 Luxembourg, and which is registered with the Luxembourg Trade and Companies Register under number B236401.

We attach a great importance to the protection of personal data entrusted to us, in particular by the users of WAVES's Sustainability Management Platform accessible at <https://waves-smp.com> as well as the various subdomains and connected domains (hereinafter, the "**platform**"). That is why we **secure and protect your data in accordance with applicable legislation**, including the General Data Protection Regulation¹ (hereinafter, the "**GDPR**") and the Luxembourg law of August 1st 2018 relating to the organization of the *Commission nationale pour la protection des données* and implementation of the Regulation (EU) 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 and repealing Directive 95/46/EC (General Data Protection Regulation), amending the Labour Code and the amended Law of 25 March 2015 laying down the salary system and the conditions and procedures for promotion of civil servants.

Through this Privacy Notice, we wish to inform you about what personal data we process about you via the platform, for what purpose we use it, and with whom we share it. We will detail the legal basis on which we process your data and explain your rights and the choices available to you.

¹ REGULATION (EU) 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, and repealing Directive 95/46/EC (General Data Protection Regulation)



PART TWO: What data about you do we process and how?

2.1 What personal data do we process about you?

We have indicated in the table below the categories of personal data that we process about you and how we collect them.

Categories of data	Description of the data
Registration details of users	This is data that must be communicated to us by yourself when you decide to register to our platform, in order to benefit of free trial (first name, last name, email address, company name).
Invoicing details of users	This is data that must be communicated to us by yourself when you decide to register to our commercial platform, in order to benefit of the platform (first name, last name, email address, company name, invoicing/ payment details).
Session ID, sidebar status	This data is collected via cookies that are strictly necessary for the functioning of our platform. For further information about these cookies, see section 2.4
Opt-in email marketing	This data is collected when you decide to accept receiving email marketing messages from us in the course of the registration process.
Opt-out email marketing	This data is collected when you decide to opt-out from email marketing when receiving the email confirmation of your registration or when receiving our Newsletter.

The use of our platform does not require any additional personal data to be processed. In case such personal data would be processed unintentionally as part of the information you upload to the platform to benefit from our sustainability management services, we exclude any responsibility for the processing of such personal data.



2.2 For what purposes do we use your personal data and on what legal basis do we use them?

We have indicated in the table below the purposes for which we process your personal data, the associated legal basis on which we legally process your personal data and the categories of personal data (as identified above) used for those purposes:

Purpose	Legal basis	Categories of data
Registration to the platform to benefit from demo version and free trial	Contract	Registration details of users
Registration to the commercial platform	Contract	Registration and invoicing details of users
Functioning of the Platform	Legitimate interest	Session ID, sidebar status
Email marketing	Consent	Registration details of users
Consent management for GDPR compliance purposes	Legal obligation	Opt-in and Opt-out to email marketing

2.3 Who has access to your data?

To pursue the purposes specified above, we will share your personal data with the following recipients:

Categories of recipients	Reason for sharing
Service Providers	We collaborate with service providers who work on our behalf and who may need access to some of your personal data to provide us with their services. These include companies we have hired to provide hosting services.
Our staff	In some cases, our staff will need access to your personal data to enable us to pursue the purposes indicated above.

Some of our service providers are located in countries other than ours. When we transfer personal data to countries outside the European Economic Area that are considered by the European Commission as not providing an adequate level of protection for personal data, we use Standard Contractual Clauses approved by the European Commission to ensure adequate protection. For further information, including a copy of the documents used to protect your personal data in such case, please contact us as indicated in section 4.2. below.



2.4 Use of Cookies

Cookies are small text files placed in the browser of your computer (or other digital device used) by websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the website. For more information, please see our current cookie policy.

2.5 Links to third party websites

On certain areas of this platform, we may provide links to third parties websites, which are not subject to this Privacy Notice. These links are provided as a convenience to you. Please be aware that we do not control such third parties or their websites and that those third parties will have a different privacy notice applying to information collected from you when you are on those third parties' websites. We encourage you read the privacy notices of all websites carefully before providing personal data.



PART THREE: How do we protect your data?

3.1 Storage duration

We retain your personal data in accordance with our data retention policy only for **as long as is necessary** to fulfill the purposes described in **section 2** above or in accordance with statutory limitation periods for claims.

3.2 Security of your data

We have implemented **technical and organizational measures** in accordance with standard industry practices to ensure an appropriate level of security of the Personal Data processed. Nevertheless, security requires efforts from all actors involved. We thus encourage you to contribute to these efforts by taking appropriate security measures yourself, including using strong passwords and keeping all usernames and passwords (if any) confidential.

3.3 Automated decision making and profiling

No automated decision-making or profiling will be made about you as part of the personal data processing described in this Privacy Notice.

3.4 Children

This platform is **not intended for or directed to children**. We do not knowingly or directly collect information from children. If you are a child, please do not use this platform and do not provide any personal data. If you are a parent or legal guardian and you believe that your child has provided us with personal information, please contact us using the contact information provided in Section 4 below.



PART FOUR: You can contact us

4.1 What are your rights?

The GDPR grants individuals' certain rights with respect to their personal data. Consequently, we are at your disposal to help you to benefit from these rights. Except as limited by applicable law and subject to applicability, the following rights are granted to individuals:

Right of access: the right to be informed about and to obtain access to the personal data processed about you;

Right to rectification: the right to obtain that we rectify or update your personal data when they are inaccurate or incomplete;

Right to erasure: the right to obtain that we delete your personal data;

Right to restriction of processing: the right to obtain that we limit the processing of all or part of your personal data;

Right to object: the right to object at any time to the processing of your personal data for reasons relating to your particular situation; the right to object at any time to the processing of your personal data for direct marketing purposes;

Right to data portability: the right to receive a copy of your personal data in electronic format and the right to transmit such personal data for use by a third-party service; and

Right to object to automated decision making: the right not to be subject to a decision based exclusively on automated processing, including profiling, producing legal effects concerning you or significantly affecting you in a similar way.

These rights may be limited, for example, if the execution of your request reveals personal data of another person, or if you ask us to delete information that we are required to retain by law or because of compelling legitimate interests.

Once we have asked for your consent, you may withdraw it at any time without justification. If you request to withdraw your consent, this will not affect the lawfulness of the processing based on consent before its withdrawal.

To exercise your rights, please contact us using the contact information provided in **section 4.2** below.

Finally, as a data subject, you have the right to lodge a complaint with a supervisory authority (in particular in the European Union Member State of your habitual residence, or your place of work, or the place of the breach) if you consider that the processing of your personal data violates the applicable legislation on the protection of personal data. For your information, you will find the contact details of the Luxembourg Supervisory Authority on its website: www.cnpd.lu



4.2. How to contact us

If you have any questions about this Privacy Notice or wish to exercise your rights, please contact us by sending us an e-mail to info@waves.lu or by writing to us at
WAVES S.à r.l.
9, Rue du Laboratoire
1911 Luxembourg

4.3 Effective date and changes

This Privacy Notice is in effect since 16 February 2021. We reserve the right, at our complete discretion, to change, modify, add, or remove portions of this Privacy Notice at any time. You should check back periodically at this page to read the most recent version of this Privacy Notice as your continued use of this platform following the posting of changes to these terms will mean you acknowledge these changes.

Thank you for visiting this platform.