

# Privacy policy and legal notice

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Version number: 1.1

## 1. Introduction

At CYCLOP, we are committed to your trust and privacy. This privacy policy (the “**Privacy Policy**”) defines how we handle, protect and use your personal data, emphasizing your control and security when navigating the CYCLOP website in accordance with all relevant laws and regulations.

## 2. User Consent

By using our website, you consent to the collection, use, and sharing of your personal information as described in this Privacy Policy. We may request your consent through methods such as checking a box, clicking a button, or continuing to browse our site. You have the right to withdraw your consent at any time by contacting us.

## 3. Who we are

CYCLOP is responsible for processing your personal data collected from [www.cyclop.lu](http://www.cyclop.lu). The data controller is:

CYCLOP S.A R.L.  
22, route de Luxembourg  
L-3253 Bettembourg  
LUXEMBOURG  
+352 26 27 52 - 1  
RCS Luxembourg: B281547  
Trade licence: 10155965/1

## 4. When We Gather Your Data

Your data becomes part of our ecosystem during your interactions with our website. This includes instances where:

- You consent to optional cookie collection.

- You complete any of our forms, such as creating an account on our Cyclop platform, submitting a job application via our website, subscribing to our newsletter, contacting CYCLOP's data protection officer, utilizing our contact form, or reaching out via email.

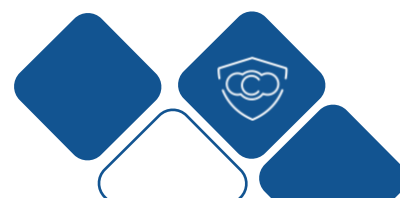
Rest assured, we only collect data that is essential to fulfill your request, all while ensuring transparency and compliance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (“**GDPR**”).

Your personal data, collected on [www.Cyclop.lu](http://www.Cyclop.lu), will be used exclusively by CYCLOP. We maintain strict control over your information to protect your privacy and uphold our commitment to data security.

## 5. Why We Collect Your Data

CYCLOP collects and processes personal data for a variety of legitimate purposes, including:

- Utilizing automated processes, driven by cookies, to aggregate statistics and analyze browsing patterns. This helps us enhance our website's quality and execute search engine advertising campaigns for marketing.
- Engaging in manual processes, where CYCLOP's dedicated teams handle contact forms and emails sent to our marketing address.
- Managing job applications, with the aim of registering your application within our human resources systems for analysis and follow-up.
- Keeping you informed about CYCLOP's events and services through our newsletter contact form.
- Enabling you to contact CYCLOP regarding any inquiries or demands related to our services through the "Contact Us" form.
- Fulfilling GDPR obligations concerning data subjects' rights via the "Contact CYCLOP DPO" form.





## 6. The Nature of Data We Collect

The personal data we may gather from [www.Cyclop.lu](http://www.Cyclop.lu) includes:

- Standard identification information such as last names, first names, email addresses, phone numbers and postal addresses.
- Official identity documents, like passports, particularly when exercising your right to access and portability of personal data.
- Professional identification data, encompassing work experience, diplomas, and CVs.
- Technical connection and navigation data, such as IP addresses, connection date and time, and cookie information.

## 7. Possible Data Transfers

In some specific situations, your data may be transferred:

- **Third-Party Subcontractors:** CYCLOP may use the services of third-party subcontractors for specialized functions. However, this only occurs if you choose to subscribe to these services on our website. Examples include mass mailing for newsletters or organising events.
- **Commercial Partners:** Your data may be shared with commercial partners, but only with your explicit consent. We value your privacy, and your data is only shared when you give us prior permission.

## 8. Legal Obligations

Under certain circumstances, CYCLOP may be legally obligated to transfer your personal data to a third party. This would only happen in response to a request from a regulatory or administrative authority authorized by law. Rest assured, we adhere to strict legal requirements in these situations, and your data will not be shared with any other third parties. Your privacy and data security remain our top priorities.

## 9. Data retention

We retain your personal data in accordance with our stated purposes and to meet GDPR compliance. Here's how we manage it:

- **Marketing Data:** We keep marketing data for up to 3 years from the end of any commercial relationship or if a prospect does not subscribe to CYCLOP's service.
- **Contractual Data:** For contractual matters (e.g., contracts, guarantees, claims, invoices), we maintain data for a maximum of 10 years from the end of the commercial relationship.

- **Job Application Data:** If you applied for a position and were not selected, we store your data for no more than 2 years after our most recent contact.
- **Data Submitted to CYCLOP Data Protection Officer:** Any data transmitted to our Data Protection Officer is retained for 1 month, with a maximum of 2 months for complex requests, as mentioned in the "Your Rights" section.

## 10. Protection of your personal data

We take data protection seriously. Here is how we safeguard your information:

- **Strict Confidentiality:** Our employees who handle personal data as part of their duties are bound by strict confidentiality. They only access the data necessary for their tasks and receive regular training on data protection.
- **Careful Selection of Subcontractors:** CYCLOP carefully selects subcontractors, ensuring they comply with GDPR standards. We never work with subcontractors who don't meet these requirements.

## 11. Utilisation of Third-Party Services

CYCLOP may incorporate third-party providers into its website to offer specific functionalities. If you decide to utilize these services while browsing CYCLOP's website, it is important to note that certain data may be collected, recorded and transmitted to the respective third-party provider of the service you are using. These third parties may process and store your personal data based on your usage of their service. For detailed information, refer to the Data Privacy Policy of the relevant third-party service.

CYCLOP may collect the following data from your use of third-party services:

### Linkedin:

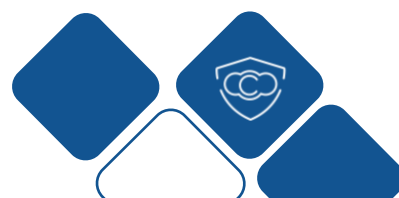
Purpose: Enhancing social media interactions.

Data potentially collected by CYCLOP: name, surname, job title, work experience, and company name.

For more information on LinkedIn's data collection and processing, please visit LinkedIn's Data Privacy Policy:

[https://fr.linkedin.com/legal/privacy-policy?trk=homepage-basic\\_footer-privacy-policy](https://fr.linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy)  
<https://fr.linkedin.com/legal/cookie-policy>

## 12. Incident Notifications





In the event of a data security incident involving your personal information (e.g., data leaks, unauthorized data modifications, data unavailability), CYCLOP follows a stringent data breach procedure. We conduct a thorough impact analysis and take appropriate remedial actions. If the incident requires notifying affected data subjects, you will be promptly informed. CYCLOP also contacts the CNPD (Commission Nationale pour la Protection des Données) as necessary.

## 13. Your Rights

Under GDPR, you have the following rights:

- **Access:** You can request information about the personal data CYCLOP processes and obtain a copy of it.
- **Rectification:** If your data is inaccurate or incomplete, you have the right to request corrections.
- **Restriction:** In specific situations, you can request restrictions on the processing of your personal data.
- **Objection:** You can object to the processing of your data, particularly for commercial prospecting purposes.
- **Deletion:** You have the right to be forgotten and request the deletion of your personal data.
- **Portability:** You can receive a universal readable copy of your personal data that you provided to CYCLOP.
- **Non-Automated Decision-Making:** You can request not to be subject to decisions based solely on automated processing, including profiling.
- **Consent Withdrawal:** If you provided consent for processing operations, you can withdraw it at any time.

You can exercise these rights free of charge by contacting us:

- **Email:** [dpo@cyclop.lu](mailto:dpo@cyclop.lu)
- **Postal Mail:** CYCLOP – 22, route de Luxembourg L-3253 Bettembourg - LUXEMBOURG

To fulfill your request and prevent identity theft, CYCLOP may ask for a copy of both sides of an official identity document when exercising your right of access and data portability. These documents are used solely to confirm your identity and are immediately deleted from our system after verification.

We respond to your requests within one month from the receipt of your completed application. In cases of numerous or complex requests, this period may extend to a maximum of two months, with the necessary authorities and data subjects duly informed, adhering to GDPR requirements.

## 14. Complaints

If you have concerns about how we handle your data, you can lodge a complaint with the CNPD (Commission Nationale pour la Protection des Données) through their website: [www.cnpd.lu](http://www.cnpd.lu).

This privacy policy outlines CYCLOP's approach to coordinating the disclosure of vulnerabilities that, if exploited, could compromise the confidentiality, integrity, or availability of our assets, including network, system, and data.

To participate in this policy, please refer to our contact form. Our team will get in touch with you promptly to receive additional information.

## 15. Changes to Privacy Policy

Cyclop reserves the right to update and modify this Privacy Policy as necessary to reflect changes in our data practices and legal requirements. We will notify users of any material changes by posting the updated Privacy Policy on our website with a prominent 'Last Updated' date. Users are encouraged to review this page periodically for any updates.

## 16. Policy Regarding Minors

If our website collects data from minors, we are committed to complying with privacy laws specific to minors, such as the Children's Online Privacy Protection Act (COPPA) in Luxembourg and similar regulations in other jurisdictions. We do not knowingly collect personal information from individuals under the age of 18 without verifiable parental consent. If you believe that we have inadvertently collected information from a minor without appropriate consent, please contact us, and we will take immediate steps to rectify the situation.

We regularly review and, if appropriate, update this Privacy Policy, as our services and use of personal data evolves. We will update the version number and date of this Privacy Policy each time it is changed.

