Model of an information notice for ‘Customers’ processing operations

**Attention:** This document is only a template for an information notice, which contains the mandatory information when personal data are collected from the data subject (Article 13 GDPR). This document should not be considered as an authoritative text or a recommendation of the National Commission for Data Protection (CNPD).

Points 1 to 4 must be supplemented and adapted on a case-by-case basis according to the activities and purposes of the data processing operations of the organisation in question. That notice shall be published on a dedicated page of the organisation’s website and in documents and correspondence intended for the data subjects.

1. Name and contact details of the controller

Name of the organisation, postal address, telephone number, e-mail address, website and possibly contact details of the legal representative.

*[****OPTION, in case of appointment of a Data Protection Officer****]* The contact details of the Data Protection Officer must be provided.

1. Purposes, legal basis of the processing and categories of data processed

The organisation processes the following data:

* for customer relations (on the basis of a contract): surname, first name, postal address, e-mail address, date of order of the service, telephone number and bank account;
* for sending newsletters (on the basis of consent): surname, first name, postal address, e-mail address;
* for the management of customer cards (on the basis of consent): surname and first name of the contact person, postal address, e-mail address, day and month of birth;
* ...
* (to be adapted on a case-by-case basis)

Consents given in connection with the ‘sending of newsletters’ and the ‘management of customer cards’ may be withdrawn at any time, in the same way as they were given, namely by making an online withdrawal request by email or by visiting your usual store.

1. Categories of recipients of the processed data

* As part of the customer relationship, data are transferred internally to employees performing a function necessary for the performance of the service (the manager, the secretary, the accountant, the sales representative, the marketing department, etc.);
* For sending newsletters, data are transferred to an external service provider

[OPTION,**in case of external recipient –** The controller should then specify which data are transferred and to which provider they are communicated]

[OPTION,**in case of third country transfer** – provide the required information on transfers to third countries – Article 13(1)(f) GDPR.]

* For the management of customer cards, data are transferred to the marketing department so that it individually informs our customers of promotional offers and offers them a personalised gift in exchange for their loyalty;
* All data are stored by a subcontracting company located in Luxembourg;
* ...
* (to be adapted on a case-by-case basis)

1. Storage period

* Customer data: 2 years later:
  + the last purchase, corresponding to the date of validity of the guarantee of our goods
  + the last service rendered,
  + ...
  + (to be adapted on a case-by-case basis)
* Data processed in connection with the management of accounting documents: 10 years from the date of the invoice to comply with a legal obligation;
* Data processed in connection with the loyalty card: 1 month from the request for withdrawal of membership by the customer or 2 years after the last purchase made by the customer or the service provided to the customer;
* Data processed in connection with the newsletter: 1 month from the request for withdrawal of membership or 2 years after the last purchase made by the customer or the service provided to the customer;
* ...
* (to be adapted on a case-by-case basis)

1. Rights of data subjects

You can access your data and obtain a copy (Article 15 GDPR), obtain the rectification of inaccurate or incomplete data (Article 16 GDPR), [**OPTION, in case of processing based on legitimate interest:** object to the processing of your data under the conditions laid down in Article 21 GDPR] and obtain the erasure of your data under the conditions laid down in Article 17 GDPR. In certain cases, you have a right to portability (Article 20 GDPR) and restriction of processing under the conditions laid down in Article 18 GDPR.

1. Complaint

If you consider that the processing of your data carried out by us constitutes a breach of the GDPR, you can lodge a complaint with the CNPD ([https://cnpd.public.lu/en/particuliers/faire-valoir/formulaire-plainte.html](https://cnpd.public.lu/fr/particuliers/faire-valoir/formulaire-plainte.html)).