# **Privacy Policy**

#### Version 003/20.02.2023

This Privacy Policy is addressed to all individuals (i.e. data subjects) who get access to and use any and all services of the following Internet sites: <a href="https://www.blockcommunicator.com/">https://www.blockcommunicator.com/</a>, <a href="https://www.blockcommunicator.com/">https://www.blockcommunicator.com/</a>, <a href="https://www.blockcommunicator.com/">https://www.blockcommunicator.com/</a>, and <a href="https://www.blockcommunicator.com/">https://www.blockcommunicator.com/</a>, <a href="https://www.blockcommunicator.com/">https://www.w3xshare.com/</a>, <a href="https://www.blockcommunicator.com/">https://www.blockcommunicator.com/</a>, <a href="https:

It may be amended or supplemented at any time by us, in particular to comply with any legislative, regulatory, jurisprudential or technological developments. In such a case, the date of its update will be identified at the beginning of this policy. These modifications engage the User as soon as they are posted online. We therefore invite the User to regularly consult this Privacy Policy in order to be aware of any changes.

#### 1. Personal Data

You have the opportunity to browse the Site without disclosing any personal information about you, such as surname, first name, email address, telephone number, etc., hereinafter referred to as your "Personal Data". We may, however, get into possession of some of your Personal Data if you contact us via email or contact form on the Site. In no case we collect any Personal Data without your knowledge or consent.

In addition, we do not collect or process sensitive Personal Data that directly or indirectly reveal your racial or ethnic origin, your political, philosophical or religious opinions, your trade union membership, your health and sexual life, and genetic data. Therefore, we request that you do not include such sensitive Personal Data about yourself or other persons in your communication and/or documents sent to us. Otherwise, we will consider that we have received the consent to use such Personal Data for the purposes of responding to your query.

## 1.1. Identity of the controller

The controller is us, CR Systems.

## 1.2. Purposes of the treatment

We may process your Personal Data for the following purpose (s):

- Contacting you to respond to your queries;
- Protecting our legitimate interests.

# 1.3. Recipients

We may share your Personal Data with the following recipients to the extent we deem such disclosure or transmission to be necessary or desirable for satisfying the aforementioned purposes:

- Administrative, regulatory and judicial bodies (in Luxembourg or abroad as the case may be);
- IT service providers that support hosting and data storage functionalities of the Site;
- Law firms, consultancy and other agencies in case we engage them for investigating and/or advising us in connection with the incidents or communications reported by you.

## 1.4. Duration of retention of your Persona Data

We will not keep your Personal Data for longer than the time necessary for satisfying the aforementioned purposes, subject to the legal periods of limitation and to the situations where applicable laws require or allow Personal Data to be retained for a certain period of time for regulatory and compliance purposes.

#### 1.5. Rights granted to data subjects

Subject to the limits set out in the applicable data protection laws, and in particular in the EU General Data Protection Regulation 2016/679, you may benefit from the following rights.

# 1.5.1. Your right of access

You have the right to ask us confirmation as to whether or not Personal Data relating to you are being processed and, where that is the case, access to the Personal Data and relevant information in that regard.

#### 1.5.2. Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete

### 1.5.3. Your right to erasure

You have the right to ask us to erase your personal information. However, we can refuse to erase your Personal Data for instance if we have a legal obligation to keep such Personal Data.

## 1.5.4. Your right to restriction of processing

You have the right to ask us to restrict the processing of your information.

## 1.5.5. Your right to object to processing

You have the right to object to processing that we carry out based on the legitimate interest we pursue. However, we remain able to process your information if we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims

#### 1.5.6. Your right to data portability

Where relevant, you have to right to request to receive Personal Data concerning you which you have provided to us on in a structured, commonly used, machine-readable format, and to transmit it to another controller

#### 1.5.7. No automated decision making

You are hereby informed that no automated decision-making or profiling is conducted. You will be informed of change in this regard.

#### 1.5.8. Your right to complain

We work to high standards when it comes to processing your personal information. If you have queries or concerns, please contact by writing a letter to the address: Quijano Chambers, P.O. Box 3159, Road Town, Tortola, British Virgin Islands

If you remain dissatisfied, you can make a complaint about the way we process your personal information to the competent data protection authority in the British Virgin Islands.

#### 1.5.9. Your right to withdraw your consent

Where a processing relies on your consent, notably via "opt-in" mechanism, you can withdraw such consent at any time.

# 2. Policy relating to cookies

Cookies are text files of limited size to recognize your computer, your tablet, or your mobile. We do not collect any cookies when you login or browse the Site.