

LHC Visitors Privacy Notice

Last revised: 25th November 2024

1. Purpose of the Notice

The Luxembourg House of Cybersecurity (hereby “LHC” or “we”) treats data protection and the privacy of individuals’ data seriously in compliance with the applicable legislation, specifically with Regulation (EU) 2016/679 (“GDPR”).

This privacy notice (hereby “the Notice”) aims at informing individuals (hereby “Visitors” or “you”) about the personal data collected by LHC in relation to their visit at LHC premises. The term “Visitor” refers to any individual, who is not an LHC staff member, and who enters LHC premises.

2. Who is the Data controller

In the context of processing the Visitor’s personal data, LHC acts as data controller. Its contact details are as follows:

Luxembourg House of Cybersecurity g.i.e.,
122 Rue Adolphe Fischer, L-1521 Luxembourg
Grand-Duchy of Luxembourg

Tel: (+352) 274 00 98 601

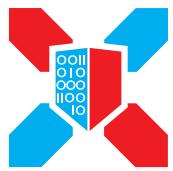
LHC has appointed a DPO who can be contacted at the following email address: privacy@lhc.lu.

3. Categories of personal data we collect

The following data is collected from Visitors:

- At the reception desk: contact details (name, surname, email address and signature) and professional information (company or affiliation).
- Before entering (i.e., at the entrance, in the LHC parking area, and internal courtyard) and while on LHC premises, Visitor’s images are being captured by the Videocamera Surveillance System installed.
- If the Visitor connects to LHC guest’s Wi-Fi, the Visitor’s device hostname and device MAC address are collected.





4. How do we use your personal data and what is the legal basis of processing?

We collect and process the Visitor's personal data for the following purposes:

- Ensuring the security and safety within LHC premises,
- Managing Visitors access to LHC premises,
- Issuing Visitor access badges,
- Responding to inquiries and requests made during the visit,
- Maintaining a Visitor's record for security purposes.

The legal basis for processing Visitor's personal data is:

- Legitimate interest for Videocamera footage and Wi-Fi access,
- Consent: for the data collected in writing at the reception desk,
- To perform the contract in case of service providers.

5. For how long do we keep the data collected about the Visitor?

The data about the Visitor is stored for a limited amount of time, as follows:

- Contact details: LHC will retain Visitor's contact details for a period of one (1) year,
- Videocamera images: LHC will retains Videocamera footage for twenty (20) days, after which the recordings are automatically deleted unless an incident is detected,
- Wi-Fi logs: LHC will retain your personal data for a period of one (1) year with the possibility to extend it in case of investigations.

6. Sharing your personal data

LHC does not share any Visitor-related personal data with entities outside the EU/EEA.

LHC does not share Visitor data with other EU-based processors, except in specific cases e.g., foreign delegations), where pre-registration is required prior to entering LHC premises. In these cases, the **Data Processor** responsible for the processing operation – specifically for providing technical resources and infrastructure via the “pretix ticket shop software” is:

rami.io GmbH,
Berthold-Mogel-Str. 1, 69126 Heidelberg
Germany (“RAMI”)

RAMI's **sub-processors** are:

(1) netcup GmbH, Daimlerstr. 25, 76185 Karlsruhe, Germany

- *Commissioned with server and computer center services for data processing and storage*





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- Computer center locations: Nuremberg (Germany)

(2) Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen, Germany

- *Commissioned with server and computer center services for data processing and storage*
- Computer center locations: Nuremberg (Germany), Falkenstein (Germany)

(3) rapidmail GmbH, Augustinerplatz 2, 79098 Freiburg i.Br., Germany

- *Commissioned with email delivery services*
- Computer center location: Germany

(4) IONOS SE, Elgendorfer Str. 57, 56410 Montabaur, Germany

- *Commissioned with server and computer center services for data processing and storage*
- Computer center locations: Germany

7. What are your rights?

The following data subject rights apply to the processing of Visitors' personal data:

- **The right to access.**
 - **For Videocamera footage:** A data subject has the right to obtain confirmation from LHC as to whether or not their personal data is being processed. For non-recorded videosurveillance, this means that once the real-time moment of monitoring has passed, the Controller can only give the information that no personal data is being processed. If, on the other hand, there is recorded video-surveillance, then personal data processing continues, and the data subject is entitled to receive access and information in line with GDPR's Art. 15. A restriction applies in this case however: the data subject making the request will not receive a copy of the footage containing their own personal data if other data subjects can be identified in the same recording. In this case, it will only be possible to view the footage on-site within the maximum storage window defined in Section 5 of this Notice. Please note that videocamera footage is not easily searchable for personal data. When exercising the right to access personal data, a data subject should indicate the day when they entered the surveilled area, within the maximum storage timeframe in Section 5).
 - **For non-videocamera footage:** Visitors can request to access the personal data collected about them at the LHC reception within the storage period defined in Section 5 of this Notice.
- **The right to rectification** – for non-videocamera footage: if any of a Visitor's details are incorrect, inaccurate or incomplete, Visitors can ask LHC to correct the data.



- **The right to request erasure.**

- **For Videocamera footage:** As LHC automatically deletes personal data being stored, data subjects cannot exercise their right to data erasure after the expiration of the erasure deadline defined in Section 5 of this Notice. Within the erasure deadline, data subjects can exercise their right to erasure as long as they are not found to be connected to any security or safety incidents.
- **For non-videocamera footage:** Visitors can request the suppression of the personal data collected about them at the LHC reception within the storage period defined in Section 5 of this Notice.

- **The right to object.**

- **For Videocamera footage:** Data subjects can also object to the recording of their personal data. This objection can be made either when entering, during the time in, or when leaving the monitored area. LHC reserves itself the right to reject the request if it considers it has compelling legitimate grounds to continue the processing of personal data.
- **For non-videocamera footage:** Visitors can object to the collection of the personal data collected about them at the LHC reception within the storage period defined in Section 5 of this Notice.

For any exercise of the above rights, LHC has the obligation to reply within one (1) month from the receipt of the request to exercise a GDPR right. In case of excessive or unfounded requests of the data subject, a reasonable fee might be charged, in accordance with GDPR's Article 12 (5) (a), or refuse to act on the request (GDPR's Article 12 (5) (b)). In order to avoid unlawful access to personal data, LHC will request to provide a proof of identity of the requesting data subject.

8. Personal data processing - security measures

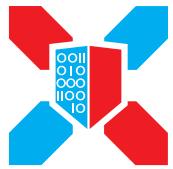
In accordance with the GDPR, LHC has implemented appropriate technical and organisational measures to prevent or respond to any unauthorised or unlawful processing, disclosure, accidental loss, modification or destruction of personal data.

In particular, access to personal data is restricted on a need-to-know basis, ensuring that only LHC staff who require access for legitimate purposes can access the Visitor's personal data. Additionally, LHC has established data processing agreements with LHC's processors in relation with processing Visitors' personal data.

9. If necessary, where to complain?

In line with GDPR's Art. 13.2 (d), data subjects have the right to lodge a complaint with the Luxembourg data protection authority:





LHC

Luxembourg House
of Cybersecurity

Commission Nationale pour la Protection des Données -
CNPD
15, Boulevard du Jazz
L-4370 Belvaux
Grand-Duchy of Luxembourg

Tél. : (+352) 26 10 60 -1

10. Changes to this Notice

As the Data Controller, LHC reserves the right to update this Notice from time to time, should any material changes occur to the processing activities.

Luxembourg House of Cybersecurity g.i.e.
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L-1521 Luxembourg

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Opening hours :
09:00 – 12:00
14:00 – 17:00

