



Privacy Statement

Website | [NSI Luxembourg PSF SA](#)

WHO ARE WE?

NSI Luxembourg PSF SA with registered office at 25 Rue Henri Koch, 4354 Esch-sur-Alzette, registered with the Luxembourg Trade Register under number B168035, VAT n. LU35838066, We act as a **data controller** for the personal data we receive and process through your use of our website(s) or in the context of other internal or external activities we engage in.

WHY DO WE PROCESS YOUR PERSONAL DATA?

GENERAL

Contact

Legitimate Interest - You can contact us through our contact forms, mail, phone or other communication channels. We process your personal data in order to manage your contact request and provide you with the necessary information and assistance.

WHAT PERSONAL DATA DO WE PROCESS?	HOW DID WE OBTAIN THIS DATA?	WHAT IS THE RETENTION PERIOD?	WHICH THIRD PARTIES MAY RECEIVE YOUR DATA?
Identification and contact data	Directly from you when you contact us	As long as necessary to process the contact request	ICT service providers

Complaints, Data Subject Right Requests and other Legal Actions

Legal Obligation - We will process your personal data to fulfill your data subject right request in accordance with the applicable Data Protection Legislation and this privacy statement (see below under “What are your rights and how can you exercise them?”). We will process your personal data if we need to defend ourselves in case of a legal proceeding to which your personal data is relevant and to comply with any court orders or other legal obligations.

Legitimate Interest – NSI processes your personal data to investigate and address complaints in a fair, timely and effective manner.

WHAT PERSONAL DATA DO WE PROCESS?	HOW DID WE OBTAIN THIS DATA?	WHAT IS THE RETENTION PERIOD?	WHICH THIRD PARTIES MAY RECEIVE YOUR DATA?
Identification and contact data Any other specific personal data relevant to the complaint, data subject right request or legal action	Directly from you as a complainant, data subject or party involved in any other legal action	During the handling of the complaint, data subject right request or legal action and up to 10 years after our last interaction with you as a potential complainant or requester (as evidence for any potential legal actions). In case of a legal action related to a property right the retention period will be extended to 30 years	ICT service providers Public authorities

Proper Functioning and Security of the Website

Legitimate Interest - For purposes of technical maintenance, optimization and security of our website, we may process your personal data. This allows us to diagnose and resolve technical problems, ensure the compatibility of our website with different devices and browsers, enhance your user experience and protect against cybersecurity threats.

WHAT PERSONAL DATA DO WE PROCESS?	HOW DID WE OBTAIN THIS DATA?	WHAT IS THE RETENTION PERIOD?	WHICH THIRD PARTIES MAY RECEIVE YOUR DATA?
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Identification and contact data	Directly from you as a website visitor or user	For technical maintenance, optimization and security as long as necessary and up to 1 year after your website visit	ICT service providers
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Visitor Access Management

Legitimate Interest - We may process your personal data for the purposes of managing our visitor flow, ensuring the security of our premises, employees and information, contacting you as our visitor, logging and monitoring visitor network behavior and Wi-Fi usage (guest network), and for auditing purposes.

WHAT PERSONAL DATA DO WE PROCESS?	HOW DID WE OBTAIN THIS DATA?	WHAT IS THE RETENTION PERIOD?	WHICH THIRD PARTIES MAY RECEIVE YOUR DATA?
Identification and contact data Profession and position Audio and/or visual recordings (pictures, video, ...)	Directly from you as a visitor of our premises or indirectly from a representative of your organization	Up to 1 year after the visit. For CCTV footage up to 1 month, unless it is used as evidence of a crime, damage or nuisance or to identify an offender, public disturbance, witness or victim.	ICT service providers

(DIRECT) MARKETING AND SALES

Analytics and Data Driven Insights

Consent - When we receive your consent, we may process your personal data for analysis purposes about the use of and interaction with our website. Additional information is available in our cookie statement.

Legitimate Interest – NSI may process personal data to analyze user behavior, identify areas for improvement, personalize your user experience and gain insights to our user demographics.

WHAT PERSONAL DATA DO WE PROCESS?	HOW DID WE OBTAIN THIS DATA?	WHAT IS THE RETENTION PERIOD?	WHICH THIRD PARTIES MAY RECEIVE YOUR DATA?
Identification and contact data Usage data	Directly from you as a website visitor or user	Up to 2 years after collection of the data For analytical purposes for cookies in accordance with the retention periods defined in the cookie statement.	ICT service providers

Event and Webinar Management

Consent - If we take images or video recordings during the event or webinar that extend outside of atmospheric images and are focused on you as an individual, we will ask for your explicit consent to allow us to use them for future marketing purposes.

Performance of a contract - We process personal data for managing the registrations and invitations in order to enable participation to the events and webinars.

Legitimate Interest - We process personal data when we organize events and webinars for purposes of informing and connecting you with us as an organization

WHAT PERSONAL DATA DO WE PROCESS?	HOW DID WE OBTAIN THIS DATA?	WHAT IS THE RETENTION PERIOD?	WHICH THIRD PARTIES MAY RECEIVE YOUR DATA?
Identification and contact data Audio and/or visual recordings (pictures, video, ...)	Directly from you as a participant	Up to 2 years after the end of the event or webinar or after the last meaningful interaction with you	ICT service providers Co-organizers

		As long as the content is published on our website(s) or social media or until your consent is withdrawn	
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Lead Generation and Prospect Management

Legitimate Interest - At NSI, we process your personal data to determine your potential interest in our products and services in order to contact you and to maintain and personalize our interaction with you.

WHAT PERSONAL DATA DO WE PROCESS?	HOW DID WE OBTAIN THIS DATA?	WHAT IS THE RETENTION PERIOD?	WHICH THIRD PARTIES MAY RECEIVE YOUR DATA?
Identification and contact data Profession and position	Directly from you as a lead or prospect or indirectly from external third party resources	Up to 2 years after the last meaningful interaction with you	ICT service providers

Newsletters

Consent - On our website you can subscribe to our newsletter. We process your personal data in order to contact you about valuable information, updates, and insights from NSI.

WHAT PERSONAL DATA DO WE PROCESS?	HOW DID WE OBTAIN THIS DATA?	WHAT IS THE RETENTION PERIOD?	WHICH THIRD PARTIES MAY RECEIVE YOUR DATA?
Identification and contact data	Directly from you as a subscriber	As long as consent is not withdrawn	ICT service providers

Providing Informational Materials

Legitimate Interest - We may process personal data about you when you request or download informational materials (ebooks, whitepapers, ...) from us that we make publicly available. We do this for the purpose of providing relevant and informative content.

WHAT PERSONAL DATA DO WE PROCESS?	HOW DID WE OBTAIN THIS DATA?	WHAT IS THE RETENTION PERIOD?	WHICH THIRD PARTIES MAY RECEIVE YOUR DATA?
Identification and contact data	Directly from you as a requester	As long as necessary to complete the request or download	ICT service providers

Social Media Management

Legitimate Interest - NSI processes personal data to connect with potential and existing customers and other interested individuals, to share news and updates and to create a community around our brand for the purpose of promoting our products, services and content to a wider audience.

WHAT PERSONAL DATA DO WE PROCESS?	HOW DID WE OBTAIN THIS DATA?	WHAT IS THE RETENTION PERIOD?	WHICH THIRD PARTIES MAY RECEIVE YOUR DATA?
Identification and contact data	Directly from you as a social media user	As long as we have a connection with you through the relevant social media platform	ICT service providers

Testimonials and Blogs

Consent - We process your personal data to share positive customer experiences and create engaging website content to promote our products and services to potential customers.

WHAT PERSONAL DATA DO WE PROCESS?	HOW DID WE OBTAIN THIS DATA?	WHAT IS THE RETENTION PERIOD?	WHICH THIRD PARTIES MAY RECEIVE YOUR DATA?
Identification and contact data Audio and/or visual recordings (pictures, video, ...)	Directly from you as a representative of a customer or writer of a blogpost	As long as the content is published on our website(s) or social media or until your consent is withdrawn	ICT service providers

RECRUITMENT

Job Application and Talent Pool Management

Consent / Legitimate Interest - When you apply for a position at our company, we process personal data to assess your suitability for the position and to communicate with you during the recruitment process. We may process personal data to identify and contact promising candidates with the required skills and experience for open positions.

WHAT PERSONAL DATA DO WE PROCESS?	HOW DID WE OBTAIN THIS DATA?	WHAT IS THE RETENTION PERIOD?	WHICH THIRD PARTIES MAY RECEIVE YOUR DATA?
Identification and contact data Personal characteristics Education and training Profession and position Leisure activities and interests Audio and/or visual recordings (pictures, ...)	Directly from you as an applicant or indirectly by referral of an (ex-)employee of NSI or from a recruitment agency Indirectly from you through professional networking sites (e.g. LinkedIn, ...)	Up to 3 months for non-responding candidates and up to 3 months after the end of the recruitment process for responding candidates if not recruited. If we have received your consent to retain your data for a longer period, we will do so for a period of 5 years.	ICT service providers

CUSTOMER AND SUPPLIER MANAGEMENT

Customer Relationship Management (CRM)

Performance of a contract - NSI processes personal data of customer employees or representatives to fulfill our contractual obligations, manage orders, billing or providing customer support.

Legitimate Interest - We process your personal data as a customer of ours in order to keep your customer account up to date, personalize our communications with you and offer you relevant products and services.

WHAT PERSONAL DATA DO WE PROCESS?	HOW DID WE OBTAIN THIS DATA?	WHAT IS THE RETENTION PERIOD?	WHICH THIRD PARTIES MAY RECEIVE YOUR DATA?
Identification and contact data Financial data	Directly from you as an employee or representative of a customer	As long as we have an agreement with the customer and up to 10 years after our relationship with the customer ends (as evidence for any potential legal actions)	ICT service providers

Partner, Supplier and Vendor Relationship Management (SRM)

Performance of a contract – NSI processes personal data of partner, supplier and vendor employees or representatives to fulfill its contractual obligations, manage service delivery, process payments or request partner, supplier or vendor support.

Legitimate Interest - We process your personal data as a partner, supplier or vendor of ours in order to manage our procurement process, evaluate partner, supplier or vendor performance and assess the potential risks in relation to partner, supplier or vendor products or services.

WHAT PERSONAL DATA DO WE PROCESS?	HOW DID WE OBTAIN THIS DATA?	WHAT IS THE RETENTION PERIOD?	WHICH THIRD PARTIES MAY RECEIVE YOUR DATA?
Identification and contact data Financial data	Directly from you as an employee or representative of a supplier or vendor	As long as we have an agreement with the supplier or vendor and up to 10 years after our relationship with the supplier or vendor ends (as evidence for any potential legal actions)	ICT service providers

APPLICATIONS

Use of Our Software Applications

Performance of a Contract – NSI processes personal data to enable the core functionalities of the application and to ensure optimal performance.

Legitimate Interest - When you use our software applications, we might process personal data for purposes of analysis of usage patterns, improvement reason, development of new features and technical support.

WHAT PERSONAL DATA DO WE PROCESS?	HOW DID WE OBTAIN THIS DATA?	WHAT IS THE RETENTION PERIOD?	WHICH THIRD PARTIES MAY RECEIVE YOUR DATA?
Identification and contact data Usage data Personal data provided by the specific user	Directly from you as a user	During the of our software applications and for a reasonable period after your account becomes inactive (depending on the application)	ICT service providers

WHY DO WE SHARE YOUR PERSONAL DATA WITH THIRD PARTIES?

We may share your personal data with other third parties. We only do so if this is necessary to provide our services, to comply with our legal obligations or if it is at your request. We will conclude the **necessary agreements** (such as **data processing agreements**) with these third parties to ensure that your personal data is processed in accordance with the relevant data protection laws (including the GDPR) and NSI's standards.

In any case, we will not simply transfer your personal data to third parties outside the European Economic Area ("EEA"). In certain cases, however, **international transfers** may occur. We will ensure that such transfers are in accordance with the GDPR (by, among other things, the presence of an **adequacy decision** in the destination country or the conclusion of **SCCs** and supplementary measures where appropriate, etc.).

HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

We do **not retain** your personal data **longer than strictly necessary** to fulfill the purposes for which the personal data were collected or according to the legal obligation imposed on us. The specific retention periods for your personal data may vary depending on the nature of the data and the purposes for which they are processed. We regularly review our data retention policies and procedures to ensure they are in accordance with legal requirements and best practices.

ARE YOUR PERSONAL DATA SECURE WITH US?

We have implemented a range of **technical and organizational measures** designed to protect against misuse, loss, unauthorized access and other unwanted practices with your personal data. We **continuously monitor and update** these security measures to ensure we are adapted to evolving threats and technological advancements. In the unlikely event of an **incident or data breach** involving your personal data, we will notify you in line with our legal obligations.

WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

NSI wants you to **maintain control** over the processing of your personal data. In this section you will find more information about the different **rights** you have regarding the processing of your personal data:

- **Right of access:** You have the right to access any personal data we process in relation to you. If you would like a copy of this data, please let us know and we will send it to you digitally or on paper.
- **Right to rectification:** If you believe that the personal data we retain about you are inaccurate or incomplete, you have the right to have this information corrected or, considering the purposes of the processing, supplemented.
- **Right to Erasure (“Right to be forgotten”):** Where your personal data are no longer necessary for the purposes of this privacy statement, you have the right to request the erasure of that data. In certain circumstances, we are required by law to retain certain personal data in which case we cannot fulfill this request.
- **Right to Restriction of Processing:** In some cases, you have the right to restrict the processing of your personal data. This means that the personal data may only be stored by us and processed by us only for limited purposes.
- **Right to Data Portability:** For certain processing activities, you have the right to receive a copy of your personal data in a structured, commonly used and machine-readable format and/or to transmit it to another data controller.
- **Right to Object:** You have the right to ask us to stop processing your personal data, typically for purposes of direct marketing.
- **Right to Withdraw Consent:** Where we process your personal data based on a consent we have obtained from you, you have the right to withdraw this consent at any time.

To exercise one or more of these rights or if you would like more information, you can **contact our Data Protection Office** at privacy@nsi.lu. We will **respond** to your request and inquiries regarding your rights in a **timely manner** and in accordance with applicable data protection laws. Depending on the processing activity, there may be certain conditions or restrictions attached to the exercise of the above rights. In addition, we may require **verification** from you as a data subject before we can proceed to fulfill the request.

In the event that you are of the opinion that we are not in compliance with the relevant data protection laws and you do not reach a solution with us, you are always entitled to **file a [complaint](#)** with the Luxembourg Data Protection Authority.

www.cnpd.lu

CHANGES TO THIS PRIVACY STATEMENT

To ensure transparency about our processing activities, we will **update** this privacy statement when necessary to reflect changes in legislation, guidelines issued by data protection authorities, feedback we receive from data subjects or other stakeholders, changes in our services, or changes in our processing activities and data protection policies. The **effective date** of this privacy statement can be found at the top of this page under "**last updated**". We encourage you to periodically review this privacy statement in order to understand how NSI is protecting your personal data.

CONTACT

Do you have any questions about this privacy statement or would you like additional information about how we process personal data? Do not hesitate to **contact our Data Protection Office** using the following contact information: privacy@nsi.lu