



**Centre de Langue et de Culture Chinoises du Luxembourg**  
**卢森堡中国语言文化中心**

**CLCCL PRIVACY POLICY**

**CODE OF CONDUCT (GDPR Art. 40 Section 5)**

CLCCL, acting as Data Controller in reference of the EU GDPR, represented by its Administration Board (referred as the Committee) and its President, is fully aware, being properly trained by the Data Protection Officer (referred as DPO) about the fact that GDPR is about building real lasting trust backed by strong legislation. The trust is based on mutual consensual relationship between Data Processor, Data Controllers and Subjects.

Each member of the Administration Board being individually responsible, certifies hereafter that:

the controller (CLCCL) and its various CLCCL processors (staff having been trained and involved in processing operations), are implementing appropriate technical and organizational measures ('Integrity & Confidentiality') required by this Regulation to ensure a level of security appropriate to the risk, to safeguard the rights and freedoms of the data subject ('storage limitation'), including inter alia as appropriate:

- a) the pseudonymization and encryption of personal data;
- b) lawfully (data consent), fairly and in transparent manner processed;
- c) personal data collected for specified, explicit and legitimate purposes;
- d) the legitimate interests pursued by controllers in specific contexts;
- e) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimization');
- f) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
- g) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('time limitation');
- h) the information provided to the public and to data subjects;
- i) the exercise of the rights of data subjects;
- j) the information provided to, and the protection of, children, and the manner in which the consent of the holders of parental responsibility over children is to be obtained;
- k) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- l) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;



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- m) a process (every 6 month) for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing.

CLCCL and its individual members, recognize being accountable for, and be able to demonstrate compliance with the requirements and principles relating:

to processing of personal data for the purpose determined in the CLCCL information notice, and in the way in which personal data is processed, specified in its CLCCL Registry activity (Records of processing activities), attached to this document.

Those documents are available under an electronic form, to the supervisory authority (Commission Nationale pour la Protection des Données) on request.

Done in Luxembourg in 3 authenticated copies on the 21<sup>th</sup>. of February 2020

The CLCCL Committee