

## Data Privacy Policy

The website [www.psylux.eu](http://www.psylux.eu) (hereinafter „website“) is operated by Group Psylux SA, 53, route d'Arlon, L-8211 Mamer (hereinafter „Group Psylux“ or „we“). Group Psylux is responsible for the collection, processing and use of personal data, which are collected from or entered into by the visitors of the website (hereinafter „user“ or „you“), and the compliance of the data processing with the applicable law.

Your trust is very important to Group Psylux. Group Psylux is aware of the fact that personal data may contain sensitive health data, which are particularly worthy of protection. Therefore, Group Psylux takes the subject of data protection very seriously and complies with the applicable data protection regulations.

Group Psylux takes data protection very seriously. Consequently, we are committed to the protection of your personal data and comply with the legal requirements of the General Data Protection Regulation of the European Union (GDPR).

Certain information provided by the user may fall under the scope of patient's secrecy according to art. 321StGB. Even if Group Psylux implements the highest security measures for the transmission and storage of data, Group Psylux recommends to not transmit such information through the website or to keep the according information as general as possible. Reservation is made for data processing opportunities for which it is hereafter explicitly mentioned that patient data can be submitted.

Hereinafter, you as user will find information about which personal data Group Psylux will collect and process in connection with the website.

### 1. Scope and purpose of the collection, processing and use of personal data

#### 1.1 When accessing the website

While visiting the website, the server temporarily stores each access in a log file. Until the automatic deletion, the IP address of the requesting computer, date and time of the access, the name and the URL of the retrieved file, the website from which the access took place and the operating system used by user's computer and the browser used by the user as well as the country, from where the user has accessed among other things, will be automatically collected.

The collection and processing of these data are generally anonymized without personal reference for the purpose, to enable the use of the website (connection establishment), to guarantee permanently the system security and stability and to optimize the internet offer as well as for internal statistical purposes. The information mentioned above will not be linked or stored with personal data.

Only in the case of an attack on the net infrastructure of Group Psylux or in case of suspicion of an illegal use or misuse of the website the IP-address will be analyzed for investigation and defense purposes and potentially used in the course of a criminal proceeding for the identification and for civil and criminal law actions against the respective user.

We rely on our legitimate interests within the meaning of Art. 6 para. 1 lit. f. GDPR to process the data for these purposes.

## 1.2 Contact form

Apart from this passive data acquisition and the hereinafter described data processing for advertising purposes, Group Psylux collects and processes personal data only if the user voluntarily forwards the personal data to Group Psylux, e.g. by email or contact form.

By communicating personal data to Group Psylux, the users agree that Group Psylux stores the data and processes it to answer questions, process requests, send the requested information or provide eventually requested services.

The legal basis for the processing of data voluntarily provided by the user lies in the consent pursuant to Art. 6 para. 1 lit. a GDPR and, e.g. for contact inquiries, in our legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR. Users can object to this data processing at any time (see contact data below).

## 2. Use of data for advertising purposes/ Newsletter

Group Psylux uses so-called re-targeting technologies on the website. In doing so, the user's behavior is analyzed on the website in order to be able to subsequently offer individual tailored advertising to the user on the partner websites. The behavior of the user is recorded pseudonymously.

Most of the re-targeting technologies work with cookies (see therefore section 8 below).

This website uses Doubleclick by Google, a service of Google LLC. („Google“). Google uses therefore the so-called DoubleClick-Cookie which allows to recognize the browser used by a specific user when this user visits other websites. The information generated by the cookie regarding the visit of these websites (including the IP addresses) are transmitted to a Google server in the US and stored there (you will find additional information about personal data transfer to the US in section 9 below).

Google will use this information to evaluate the use of the website with regard to the ads to be served, to compile reports on the website activities and advertisements for the website operators and to provide other services connected with the use of the website and the Internet. Google may also transfer this information to third parties as far as this is required by law or if third parties process this data on behalf of Google. However, under no circumstances will Google associate the user's IP address with other data from Google.

User can prevent re-targeting at any time by rejecting or deactivating the cookies in the web browser's menu bar (see section 8 below).

The legal basis for this processing of personal data lies in the legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR. Users can object to this data processing at any time by rejecting or deactivating cookies as described above.

## 3. Transfer of data to third parties

Group Psylux only discloses personal data from users if the user either has consented explicitly, a legal obligation therefore exists or if it is required for the enforcement of rights and claims of Group Psylux. In addition, Group Psylux will pass on personal data from users to third parties as far as it is necessary in the context of the use of the website as well as the answering of questions, processing of inquiries or for the possible provision of services required by the user. The use of the data submitted by the third parties is strictly limited to the stated purposes.

A list with third party service providers as mentioned above is available in section "third party providers" (see below). Additional service providers are explicitly mentioned in this data privacy policy (see for example in sections 2, 9 and 10).

If the personal data represents information which falls under the scope of the patient secrecy according to art. 321 StGB, this information shall in no case be passed on to third parties without the consent of the user.

#### 4. Transfer of personal data abroad

Group Psylux is entitled to forward personal data from users to third parties and service providers abroad, provided that this is necessary within the scope of the purposes mentioned in section 3 above. In doing so, the statutory provisions for the transfer of personal data to third parties are of course complied with.

These third parties are bound to the same extent as Group Psylux itself for data protection. If a country's data protection level does not comply with EU data protection law, Group Psylux contractually ensures that the protection of the personal data is always the same as the European Economic Area (EEA).

A list with third party service providers and their domiciles can be found in section "list with third party provider" (see below). Most of these service providers have their domiciles in the neighbouring countries. The website is hosted on a server in Luxembourg. Some of the service providers explicitly mentioned in this data privacy policy have, however, their domicile in the US (see sections 2, 9 and 10). Additional information about the transfer of personal data to the US can be found in section 9.

#### 5. Entitlement to disclosure, deletion, correction and data portability

Users have the right, upon request and free of charge, to receive information about personal data stored by Group Psylux about the users. In addition, users have the right to correct inaccurate data and to have their personal data deleted, insofar as this is not contrary to any statutory retention duty or any other legal basis that allows Group Psylux the processing of data.

In addition, users have the right to demand the release of the data they have provided to Group Psylux (right of data portability). Upon request, Group Psylux will also forward the data to a third party of your choice. Users have the right to receive the data in a common file format.

For this, the user contacts [info@psylux.eu](mailto:info@psylux.eu).

In addition, the user may also contact his responsible data protection authority.

#### 6. Data retention

Group Psylux only stores personal data for as long as it is necessary to use the tracking services mentioned above and other processing in the context of our legitimate interest. Contract data is retained by Group Psylux for a longer period, as this is prescribed by legal retention obligations. Retention duties, which oblige Group Psylux to store data, result from regulations on accounting and tax law. According to these regulations, business communications, contracts concluded and accounting records must be stored for up to 10 years. If Group Psylux no longer needs any such data to perform the services for the users, the data will be blocked. This means that the data may then exclusively be used for accounting and tax purposes.

## 7. Data security

Group Psylux uses appropriate technical and organizational security measures to protect personal data against manipulation, partial or total loss and against unauthorized access by third parties. These safety measures are continuously improved according to the technological development.

## 8. Cookies

In order to make the visit of the website attractive and to enable the use of certain functions, so-called cookies are installed on the website. The cookies are small text files, which are stored on the user's device. Some of the installed cookies are automatically deleted after the end of the browser session (so-called session cookies). Other cookies remain on the user's device and allow Group Psylux to recognize the browser on the next visit (persistent cookies).

Group Psylux hereby advises the users that certain cookies are already set as soon as a user accesses the website. Users can, however, set up the browser in such a way that they are informed of the setting of cookies and may decide individually about their acceptance or can exclude the acceptance of cookies for certain cases or in general. The non-acceptance or de-activation of cookies may restrict the functionality of the website.

Browsers allow the users to control the storage of cookies on their respective devices. The description for the respective browsers can be found under the following links:

Internet Explorer™: <http://windows.microsoft.com/de-DE/windows-vista/Block-or-allow-cookies>

Safari™: <http://apple-safari.giga.de/tipps/cookies-in-safari-aktivieren-blockieren-loeschen-so-geht-s/>

Chrome™: <http://support.google.com/chrome/bin/answer.py?hl=de&hlrm=en&answer=95647>

Firefox™: <https://support.mozilla.org/de/kb/cookies-erlauben-und-ablehnen>

Opera™: <http://help.opera.com/Windows/10.20/de/cookies.html>

## 9. Tracking Tools

### 9.1 Google (Universal) Analytics

The website uses Google (Universal) Analytics, a web analytics service of Google LLC. (www.google.com). Google (Universal) Analytics uses methods that allow an analysis of the use of the website, such as „cookies“ (see section 8 above). The information about the use of the website is generally transferred to a Google server in the US and stored there. By activating the IP anonymization on this website the IP address in the Member States of the European Union or in other States Parties to the Agreement on the European Economic Area is shortened prior to transmitting to the US. Only in exceptional cases the full IP address is transferred to a Google server in the US and shortened there. The anonymized IP address transmitted by Google Analytics from the user's browser is not merged with any other data from Google.

The information is used to evaluate the use of the website in order to compile reports about the activities on the website and to provide other services associated with the use of the website for the purposes of market research and the appropriate design of the website.

Users can prevent the recording of data (including the IP address) generated by the cookie and related to the website from being accessed by Google, as well as the processing of this data by Google, by downloading and installing the browser plug-in that is available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>

The legal basis for this data processing lies in the legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR. Users can object to this data processing at any time by using the aforementioned opt-out options.

## 9.2 Google AdWords Conversion-Tracking

On this website a so-called Conversion-Tracking Code of Google Inc., USA, is installed. This code or tag allows to track the conversion of Group Psylux 's Google AdWords campaigns. As soon as a user lands on a Google AdWords or any other advertisement of Group Psylux in the Google network, a temporary cookie is installed in the browser of the respective user. When this user continues to the website of Group Psylux, the code or tag on the website recognizes the cookie and is able to forward the information about this conversion to Google.

Users may prevent this tracking by rejecting or de-activating cookies (see section 8).

For the sake of completeness, Group Psylux points out to users which have a Luxembourg residency or domicile, that there are surveillance measures by the US authorities that generally enable the storage of all personal data of all persons whose data have been transferred from Luxembourg to the US. This is done without differentiation, restriction or objective criterion, which would make it possible to limit the access of the US authorities to the data and their subsequent use to very specific, strictly limited purposes, access to such data as well as their use. We also point out that in the US there are no legal remedies available to the persons concerned from Luxembourg which allow them to gain access to the data concerning them and to correct or eradicate them, or no effective judicial protection against general access rights from US authorities.

The legal basis for this data processing lies in the legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR. Users can object to this data processing at any time by using the aforementioned opt-out options.

## 10. Social Plugins

On this website social plugins are installed. These social plugins consist on the one hand side of “Like-Buttons” or similar functionalities that are typical for social media networks, on the other hand side of “dynamic” links to the sites of Group Psylux on the respective social media network. Users recognize the respective plugins because they are displayed using the logo of the respective network.

If a user is logged in its user account with the respective social media network when accessing the website of Group Psylux, the respective network may connect the website visit to his / her user account. If a user interacts with the plugins, the respective information will directly be forwarded to the server of the respective provider and stored there. The information may be published on the respective social media network and in certain circumstances displayed to other users of the network (e.g. if the “like”-button is used).

The provider of the social media network uses the information for marketing purposes, market surveys and the user-focused design of its services. In this respect use, interest or relation profiles may be created, e.g. in order to analyze the use of the Group Psylux website by the respective user with respect to the advertising displayed to this user on the social media network, in order to inform other users of the social media network about the activities of the respective user on the Group Psylux website, and in order to provide other services connected to the use of the social media network.

Purpose and extent of the data collection, processing and use by the provider of the social media networks as well as the rights and user settings for the protection of the users' privacy may be found in the data privacy policies for the social media networks.



If users do not want that the provider of a social media network is able to connect the data collected on the website of Group Psylux directly with their user account, the respective user must log out from his user account prior to using the plugins or prior to visiting the website.

The legal basis for this data processing lies the legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR. Users can object to this data processing at any time by using the aforementioned opt-out options.

#### Third Party Providers

On this website plugins of the following providers are implemented:

Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA, [www.facebook.com/privacy/explanation](http://www.facebook.com/privacy/explanation)

Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA, [twitter.com/en/privacy](https://twitter.com/en/privacy)

Instagram Inc., 1601 Willow Rd., Menlo Park, CA 94026, USA, <https://help.instagram.com/519522125107875>

## 11. Contact

If you have any questions regarding the data protection on this website, please contact [info@psylux.eu](mailto:info@psylux.eu).

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