

Arbitration Data Privacy Policy
(as of 1st October 2025)

This privacy policy (hereafter, the “**Privacy Policy**”) explains how the Luxembourg Chamber of Commerce (hereafter, the “**Chamber of Commerce**”) performing its activities through its arbitration center (hereafter, the “**LAC**”), processes¹ your personal data (hereafter “**Your Data**” or “**Data**”) when you engage with it to use the arbitration services it provides (hereafter, the “**Arbitration Process**”) in accordance with its rules of arbitration (hereafter, “**Rules of Arbitration**”).

The Privacy Policy sets out how the Chamber of Commerce collects Your Data, what it does with it and how it keeps it secure. It also explains your rights in relation with Your Data.

1. Who is the Controller of Your Data?

The Chamber of Commerce (in French “*Chambre de Commerce*”), having its registered office located at 7, rue Alcide de Gasperi, L-1615 Luxembourg, is the data controller responsible for Your Data.

Should you have any question regarding the Privacy Policy or should you wish to exercise your rights as set out in section 8 below, please contact the Data protection officer of the Chamber of Commerce by sending an email to: dpo@cc.lu.

2. Why does the Chamber of Commerce process Your Data?

The Chamber of Commerce processes Your Data for the following purposes:

Legal basis for the processing	Purpose of the processing
The processing is necessary for the performance of a contract to which you or your organisation is a part of.	<ul style="list-style-type: none">• to ensure that the arbitration procedure is carried out in accordance with the LAC’s Rules of Arbitration and manage the arbitration files accordingly;• to protect the LAC interests through know your customer procedure (KYC) enabling the LAC to assess risks at the beginning of the Arbitration Process;• to collect your signature on the appropriate documents either in wet-ink or via electronic signature;• to preserve the arbitral award. <p>Your Data processed for these purposes are necessary to enter the Arbitration Process. If you do not provide such data, the LAC will not be able to provide its services.</p>

¹ Data “processing” consists, in particular, of the collection, recording, organisation, structuring, storage, adaptation, alteration or use of Your Data.

<p>The processing is necessary for compliance with the Chamber of Commerce’s legal obligations.</p>	<ul style="list-style-type: none"> • to comply with the Chamber of Commerce legal obligations regarding international and national regulations on the implementation of sanctions and restrictive measures in financial matters (to keep records of its compliance processes and financial records); • to comply with the Chamber of Commerce legal accounting obligations.
<p>The processing is necessary for the purposes of the Chamber of Commerce’s “legitimate interests”, in a way which is reasonably expected as part of running the LAC and Arbitration Process.</p>	<ul style="list-style-type: none"> • to manage the LAC and be able to communicate with arbitrators, the Council of Arbitration (as defined in the Rules of Arbitration), witness(es) and expert(s); • to manage access to and security of HighQ web platform; • to perform statistical measurements of the activity of the LAC.

3. What personal data does the Chamber of Commerce processes?

The Chamber of Commerce collects and processes personal data, such as:

- **personal identification data:** name, job title and function; date of birth, nationality, marital status, passport/ID/driving license number, nationality, VAT number, taxpayer identification number;
- **private and professional contact Data:** address(es), telephone number(s);
- **career related Data:** resume data such as, information related to university diplomas, admission to a bar association, previous arbitrator or counsel appointments, previous employments...
- **financial and payment Data:** bank account and other data necessary for processing payments and fraud prevention, and other related billing information;
- **KYC information:** relevant information as required by international and national regulations on restrictive measures in financial matters and for risk assessment. This may include evidence of source of funds. The sources for such verification may comprise documentation which the Chamber of Commerce requests from you or through the use of online sources or both;
- **social and family contacts:** links with other persons and relatives;
- **pictures:** copies of passport/ID card/driving license, profile on web platform;
- **travel details:** travel arrangements and their costs exchanged between parties;
- **technical data:** data collected when you access High Q web platform such as time of connection uploaded/downloaded documents, etc.;
- **statistical data:** collection and analysis of anonymized data related to the number, type, duration, and outcome of arbitration cases, etc.

Furthermore, the Chamber of Commerce cannot always control the extent of personal data that is provided or made accessible to it by you and/or third parties since files and documents that are provided to it during the Arbitration Process, may contain personal data that the Chamber of Commerce have not specifically requested or do not need to process for the intended purpose.

The Chamber of Commerce encourages you and any third party, to only provide it with information that is relevant to process for the intended purpose. Therefore, you should not provide the Chamber of Commerce with information which is not relevant to process for the intended purpose, unless personal data contained therein is removed, pseudonymised, anonymised or otherwise made unavailable to the Chamber of Commerce prior to providing it with the latter.

4. How does the Chamber of Commerce collect Your Data

The Chamber of Commerce either collects Your Data directly from you (you or your organisation) or indirectly from third parties (for instance: another party to an arbitration proceeding, arbitrators, lawyers, witnesses, public registers...). It may also generate independently personal data as required for risk assessment purposes (KYC), for compliance with applicable law (in particular for restrictive measures in financial matters) and security management of the web platform.

If you provide the Chamber of Commerce with personal data not relating to you, it assumes that you and/or any third-party who is providing such personal data is doing so in compliance with laws and in particular with the applicable data protection laws.

Therefore, the Chamber of Commerce requests you to disclose this Privacy Policy or its contents to any data subject whose personal data is provided to the Chamber of Commerce (for instance, information about your client(s), its representative(s), yours or its staff member(s), its beneficial owner(s), its shareholder(s), etc. or about any third party). The Chamber of Commerce will assume that these third parties are informed of the processing of any personal data relating to them that the Chamber of Commerce may carry out.

5. With whom does the Chamber of Commerce share Your Data?

The Chamber of Commerce may share Your Data with:

- **Parties** to arbitration cases;
- **Third parties connected to the Arbitration Process**, including lawyers, arbitrators, members of the Council of Arbitration, witnesses, experts;
- **Service providers** such as IT service providers hosting the data, mainly Thomson Reuters (Professional) UK Limited, Adobe, Microsoft and LuxTrust who process Your Data on behalf of the Chamber of Commerce and only in accordance with its instructions.

6. Where does the Chamber of Commerce transfer Your Data?

The Chamber of Commerce may transfer some of Your Data to an international organisation or to a country located outside the European Economic Area²:

- subject to an adequacy decision made by the European Commission;
- not subject to an adequacy decision made by the European Commission, to which such transfers are governed by way of appropriate guarantees (such as the European Commission's standard contractual clauses) in order to guarantee an adequate level of protection for the transferred data in all circumstances;

² The European Economic Area consists of the European Union, Lichtenstein, Norway and Iceland.

- in the absence of an adequacy decision or appropriate guarantees, because the transfer is necessary for the establishment, exercise or defence of legal claims.

7. For how long does the Chamber of Commerce keep Your Data?

The Chamber of Commerce will only retain Your Data in accordance with applicable laws, regulations and guidelines provided by supervisory authorities and as long as necessary to fulfil the purposes for which it processes it.

For instance, the Chamber of Commerce will keep:

- data related to any Arbitration Process for a period of fifty years starting at the end of the calendar year on which the relevant arbitration proceeding was closed or abandoned;
- accounting documents for a period of ten years after the end of the annual accounting period to which they relate according to its obligations;
- arbitral awards until the end of the LAC's existence;
- KYC information and records of compliance processes or financial records for a period of five years starting at the end of the calendar year on which the final award was rendered, or the procedure was closed, except in cases where the arbitration proceeding is rejected, particularly following a risk assessment, in which case the retention period extends to fifty years from the end of the calendar year of rejection;
- documents signed electronically until this document is deleted from the corresponding platform where it is located;
- connection data and technical information for a period of maximum six months from the time they are generated;
- statistical data for as long as is necessary based on the purpose of the processing.

Should you wish further information about specific retention periods for Your Data, please contact the Data protection officer of the Chamber of Commerce at the following address: dpo@cc.lu.

8. What are your rights?

You have certain rights concerning Your Data as detailed below.

- **Right of access:** you have the right to obtain from the Chamber of Commerce confirmation as to whether or not personal data concerning you are being processed by it, and, where that is the case, access to Your Data.
- **Right to rectification:** you have the right to obtain from the Chamber of Commerce without undue delay the rectification of inaccurate or incomplete personal information concerning you.
- **Right to erasure:** you have the right to obtain from the Chamber of Commerce the deletion or removal of Your Data without undue delay.

- **Right to restriction of processing:** you have the right to obtain from the Chamber of Commerce restriction of processing in certain circumstances, such as where you contest the accuracy of that personal information or you object to the Chamber of Commerce using it.
- **Right to data portability:** you have the right to receive Your Data (in a structured, commonly used and machine-readable format), which you have provided the Chamber of Commerce with and to reuse these data or to transmit those data to a third party of your choice.
- **Right to object:** you have the right to ask the Chamber of Commerce to stop processing Your Data, and it will do so if it is relying on its own or someone else's legitimate interests to process Your Data, unless it can demonstrate compelling legal grounds for the processing.

Please note that some of these rights may be limited where the Chamber of Commerce has an overriding interest or legal obligation to continue to process the data or where data may be exempt from disclosure due to reasons of business secrecy obligations.

Furthermore, please be aware that, in accordance with applicable law and before the information is delivered, the Chamber of Commerce may request you to specify the information or processing activities to which your request relates.

To exercise these rights, please contact the Data Protection Officer of the Chamber of Commerce at the following email address: dpo@cc.lu. In the event that the Chamber of Commerce has reasonable doubt regarding your identity when exercising your rights, it may ask you to provide additional necessary information to confirm your identity.

You also have the right to file a complaint at any time with the National Commission for Data Protection (CNPD), 15, boulevard du Jazz, L-4370 BELVAUX, (<https://cnpd.public.lu/fr.html>) or the relevant supervisory authority for your country of residence or the place of the alleged infringement if you believe that your rights specified above have not been respected.

9. How does the Chamber of Commerce protect Your Data?

The Luxembourg Chamber of Commerce undertakes to put in place the technical and organisational security measures required to protect the security and confidentiality of Your Data. The Chamber of Commerce restricts access to personal data on a need-to-know basis and applies different security measures depending on the type of data, and how it is collected and stored.

10. How will the Chamber of Commerce update the Privacy Policy?

Changes may occur in the way the Chamber of Commerce processes personal data. Therefore, the Chamber of Commerce reserves the right to update and change the Privacy Policy from time to time to reflect any changes to the way in which it processes Your Data or in case of new legal requirements. Any changes that the Chamber of Commerce may make to the Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to the Privacy Policy.

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