

Annexe 7 : GENERAL NOTICE ON THE PROTECTION OF PERSONAL DATA – CRECHES AND SERVICE D' EDUCATION ET D'ACCUEIL OT THE LUXEMBOURG RED CROSS

When enrolling your child at the *Service d'éducation et d'accueil* Ettelbruck of the Luxembourg Red Cross, you are required to provide us with your personal data and that of your child. Protecting this data is very important to us. This document is intended to inform you about the use we make of your data and the rights that you have.

WHO IS RESPONSIBLE FOR THE PROCESSING OF DATA?

The *Service Maison Relais et Crèches* of the Luxembourg Red Cross, located at 44, boulevard Joseph II, L-2014 Luxemburg is responsible for the processing of personal data.

WHY DO WE PROCESS YOUR DATA?

We process your personal data and that of your child for several reasons:

- managing the enrolment of your child at our SEA
- managing the presence and absence of your child
- managing the food service,
- managing invoicing,
- managing complaints and reporting accidents,
- managing our facilities.

Your data will be processed:

- as part of the performance of your contract with us,
- to comply with the legal obligations to which we are subject,
- as part of the execution of our public interest mission,
- on the basis of your consent for the taking and/or publishing of pictures (photographs or videos) of your child,
- on the basis of your consent for the sure of application Dimmi
- on the basis of your express consent if you have provided us with information on your child's health (allergies, food intolerances and other pathologies) and in the absence of your express consent, the processing of this health data will be carried out based on the vital interests of your child.

WHAT KIND OF DATA DO WE COLLECT?

In accordance with the law, the *Service Maison Relais et Crèches* of the Luxembourg Red Cross only collects the data necessary for the execution of its missions. This data is generally the data that you have communicated to us by means of the enrolment form (the surname and first name of your child, your address, your telephone number, etc.). Other data may be generated or collected in the course of your relationship with the Luxembourg Red Cross (for example: excursions, field trips, etc.).

This data is kept for the time necessary and at most for the period provided for by law. You can contact the *Service d'éducation et d'accueil* Ettelbruck for further information regarding the retention period.

TO WHOM DO WE COMMUNICATE YOUR DATA?

The Service Maison Relais et Crèches of the Luxembourg Red Cross treats the communicated data confidentially and only shares it with third parties when necessary and in accordance with the law. These third parties may include other Luxembourg Red Cross entities, the Municipality of Ettelbruck, Educdesign in the context of the use of the application Dimmi, the competent administrations and authorities, such as the Ministry of **Education, Children and Youth, the Ministry of Health, the National Youth Service, the school, APEMH asbl**, the food service provider, as well as service providers, particularly in the context of IT outsourcing. We make sure that your data stays within the European Union.

WHAT ARE YOUR RIGHTS?

In accordance with the law, you have the following rights:

- **The right to information.** We hope that this document has answered your questions. For any further information, you can contact the person in charge of the *Service d'éducation et d'accueil* Ettelbrécker Kannerbuerg.
- **The right to access your data.** You can access your data and your child's data by contacting the person in charge of the *Service d'éducation et d'accueil* Ettelbrécker Kannerbuerg.
- **The right to rectify your data and that of your child** if it is incorrect or out of date. You can contact the person in charge of the *Service d'éducation et d'accueil* Ettelbrécker Kannerbuerg.
- **The right to lodge a complaint** with the National Data Protection Commission (CNPD) if you consider that the processing of your data does not comply with the law.

In certain cases and under the conditions laid down by law, you also have the following rights:

- **The right to request the deletion** of your data and that of your child.
- **The right to request the limitation** of the processing of your data and that of your child.
- **The right to object to the processing** of your data and that of your child for any other legitimate reason (unless there is the a legitimate and compelling reason for the Luxembourg Red Cross to continue processing).
- **The right to portability of** the data you have provided to the Luxembourg Red Cross (i.e. the right to receive your personal data on a machine-readable medium), insofar as this is technically possible.
- **The right to withdraw your consent** to the processing of your child's health data at any time.

If you have questions or wish to exercise your rights, you can contact the person in charge of the *Service d'éducation et d'accueil* Ettelbruck by email: relais.ettelbruck@croix-rouge.lu or by post: 46, rue Grande Duchesse Joséphine Charlotte L-9013 Ettelbruck.

You can also contact the Luxembourg Red Cross Data Protection Officer by email: rgpd@croix-rouge.lu or by post:

CROIX-ROUGE LUXEMBOURGEOISE
Data protection
44, boulevard Joseph II
BP 404 L-2014 Luxembourg

In order to comply with the regulations in effect, we will update this document whenever necessary.