

PROPERTY TOKEN S.A. (PROPERTY TOKEN) and its brand Digibrixx are committed to protecting your rights when processing personal data in accordance with current legislation, including the General Data Protection Regulation (GDPR), effective as of May 25, 2018.

This policy explains how your personal data is collected, processed and used by PROPERTY TOKEN in the process of delivering our services and in your visit to and use of the Digibrixx.lu website, and its “.eu” et “.com” (Digibrixx.lu) extensions.

1. Definitions

In this privacy policy, the following terms are used:

User: anyone who visits one or more pages of the Digibrixx.lu website or contacts PROPERTY TOKEN through the website, indicating his or her identity as well as an email address.

Customer: any natural or legal person who, by way of signing an order, a contract or by using the Digibrixx.lu website, has requested the services of PROPERTY TOKEN.

Site: the website accessible at the following addresses: digibrixx.lu, digibrixx.eu, digibrixx.com.

User Content: the data sent by the user in the different areas of the Site;

Company: PROPERTY TOKEN S.A., established and having its registered office at L-8010 Strassen, 224, route d’Arlon.

2. Privacy policy

The Customer expressly agrees that his personal data may be processed electronically for the purposes of performing the contract. The Company undertakes to comply with the legal provisions in force, in particular Regulation (EU) 2016/679 on the protection of individuals regarding the processing of personal data and on the free movement of data (GDPR).

3. Person in charge of processing

The person in charge of processing personal data is PROPERTY TOKEN S.A., established and having its registered office at L-8010 Strassen, 224, route d’Arlon.

If you have any further questions regarding our processing of personal data, please feel free to contact us by e-mail at the following address: gdpr@digibrixx.eu.

4. Data collection’s method, timing, and processing

Personal data is an information which allows us to identify, directly or indirectly, a physical person.

PROPERTY TOKEN collects and processes personal data when a Customer contacts PROPERTY TOKEN by phone or by e-mail, logs in as a User, by filling in his login and e-mail address, on the Digibrixx.lu website.

The information collected is necessary to allow PROPERTY TOKEN to send the necessary information to obtain the service required by the Customer, and to best identify the Customer and his interests, to provide the most appropriate service.

5. Types of data collected and processed

A mere consultation of the Websites does not involve the recording of personal data, with the exception, if necessary, of cookies. PROPERTY TOKEN will collect from the Customer a certain number of personal data relating to him/her, to communicate with him/her, to manage the payments and the pending payments, and more generally to carry out its contractual obligations resulting from the contract.

Depending on the manner and purpose for which the Customer contacts PROPERTY TOKEN, the type of personal data collected may vary and may include, in the extent necessary and without limitation:

- identification data (name, first name, address, e-mail address, telephone number, login, password);
- potentially bank identification data;
- any personal data contained in the text of the application for services or in submitted documents.

PROPERTY TOKEN does not prospect Customers without obtaining the Customer’s prior express and unequivocal consent.

6. Purpose of data processing

PROPERTY TOKEN processes the collected data:

- to authorize access, by the duly authorized User, to the Sites and to certain functionalities of the latter;

- to inform the User, upon request, of the content of the services offered by PROPERTY TOKEN;
- for the purpose of performing the services ordered by the Customer (including the management of payments and arrears and the follow-up of the Customer relationship) as well as the services ordered on the Digibrixx.lu website;
- to enable PROPERTY TOKEN to meet its contractual and legal obligations;
- to allow PROPERTY TOKEN to enhance and improve its products and service offering and thus better meet the expectations of its Customers;
- to manage requests for access, rectification and opposition rights, and other rights regarding personal data;
- to manage notices, issues, complaints, and litigation.

7. Recipients of personal data

The personal data collected by PROPERTY TOKEN are processed by internally authorized persons, within the limits of their respective attribution.

It may also be shared with the competent administrative and judicial authorities, as well as with subcontractors and external service providers of PROPERTY TOKEN, only to the extent necessary and subject to the existing contractual guarantees to ensure the security and confidentiality of the data.

8. Legal grounds for the collection and processing of data and retention period

The personal data collected and processed by PROPERTY TOKEN are required for the execution of the services requested by the Customer as well as to allow BIGBANG to fulfil its contractual obligations. They are also necessary to PROPERTY TOKEN to enhance and improve its service offer and thus to better meet the expectations of its Customers.

Considering the above-mentioned purposes, the legal basis of the data processing carried out by PROPERTY TOKEN is mainly related to the execution of a contractual obligation. For some data processing, the legal basis can be an answer to a legal obligation, or a legitimate interest of PROPERTY TOKEN.

PROPERTY TOKEN ensures the protection of its Customers' rights as mentioned in point 9. In addition, PROPERTY TOKEN commits itself to implement technical and organizational security measures to ensure the protection of its Customers' personal data against the risks of using information systems.

The Customer's personal data collected by PROPERTY TOKEN within the framework of its services resulting from the contract are preserved for a period of ten (10) years, as from the end of the professional relation, corresponding to the duration of the adequate prescription.

Upon request via the Digibrixx.lu website, the User's personal data collected by PROPERTY TOKEN in this context will be stored for a period of ten(10) years, from the end of the contract at the request of the User or on the initiative of PROPERTY TOKEN, corresponding to the duration of the appropriate statute of limitations, otherwise for one (1) year, if the aforementioned request did not conclude a contract.

In case of registration to an event organized by PROPERTY TOKEN (*workshop, in particular*), the natural persons' personal data possibly collected within this framework are preserved during a period of two (2) years, as from the last event to which the Customer agreed.

All accounting documents drawn up within the framework of the contractual relationship by the Company (orders, contracts, invoices, etc.) shall be kept for a period of ten (10) years from the due date, corresponding to the duration of the applicable prescription

9. Customer's rights regarding personal data

Under the current legislation, the Customer or, if applicable, his successors in title, who have a legitimate interest, are entitled to obtain:

- access to his/her data;
- confirmation of whether or not data about him/her is being processed;
- information at least on the processing purposes, the categories of data to which the processing relates and the recipients or categories of recipients to whom the data are disclosed;
- communication, in an accessible form, of the data being processed, as well as of any available information on the origin of the data.

The Customer (or, if applicable, his beneficiaries) also has the right to rectify personal data about him/her and the right to object to the collection and the processing of such data, on the condition of providing overriding and legitimate reasons.

These rights can be expressed by postal mail to PROPERTY TOKEN or by e-mail to: rgpd@digibrinx.eu. The recipients to this e-mail reserve the right to verify your identity.

The Customer is also entitled to request the erasing of all or part of the data or a limitation of the processing, to make use of his/her right to data portability, within the limits provided for by the applicable rules.

The data subject may appeal to a supervisory authority such as La Commission Nationale pour la Protection des Données (CNPD) in the event of failure to comply with the applicable rules on personal data protection.

The Customer commits itself to inform PROPERTY TOKEN within fifteen (15) working days of all modifications of information which he/she provided at the time of the contact, and of an address modification.

10. Personal data management policy modification

PROPERTY TOKEN is free to modify its policy of personal data management any time. These modifications will then be available on the policy page of the website for the management of personal data.