



**Jackye Elombo** is attorney-at-law (“*avocat à la Cour*”) admitted to and registered with the Luxembourg Bar Association (List I) registered with and regulated by the Luxembourg Bar Association (“Ordre des Avocats du Barreau de Luxembourg”), working as independent lawyer (the “**Lawyer**”) and partner in her own practice (the “Law Firm”, “we” or “us”).

The information provided under this website (the “**Website**”, namely the following address: [www.jackyeelombo.com](http://www.jackyeelombo.com)) is solely available at your request for information purposes only. It should not be interpreted as soliciting or advertisement.

The Law Firm is not liable for any consequence of any action taken by the user relying on material / information provided under this Website. In cases where the user has any legal issues, he/she in all cases must seek independent legal advice.

The use of this Website is subject to the conditions described below, that is, our cookies, disclaimer intellectual property and personal information (the “**CDIP Policy**”) and privacy notice (the “**Privacy Notice**”) (the “**Website Policies**”). Consequently, any person consulting or viewing this Website is presumed to have agreed to these Policies.

## Cookies Disclaimer & IP Policy

### Definitions

In this Policy, capitalized words or phrases have the following meanings:

- **User**: any person who visits one or more pages of the Website and uses one of the services offered on the Website, including those requiring the User’s identification (through, for example, an email address and a password).
- **User Content**: refers to the data transmitted by the User in the various sections of the Website.
- **Visitor**: any person who visits one or more pages of the Website.
- **Visitor Content**: refers to the data transmitted by the Visitor in the various sections of the Website, as the case may be.

### Cookies

The protection of privacy is an important concern for us, and we are committed to being transparent about the data we collect about you, how it is used and with whom it is shared.

A cookie is a small text file in alphanumeric format placed on the user’s hard drive by the server of the visited site or by a third-party server, allowing the website to store and retrieve information about your browsing habits or the equipment from which you access the site.

**Strictly necessary cookies** are cookies that are required for the operation of our website and use of its features, and therefore cannot be switched off in our systems. The information collected relates to the operation of our website (e.g., website scripting language and security tokens) and enables us to provide you with the service you have requested. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personal data.

These cookies are used solely for the purpose of carrying out or facilitating the transmission of a communication over an electronic communications network; and strictly necessary to provide you with the information you have expressly requested (i.e., if these cookies are disabled, we will not be able to provide you with the service you have expressly requested). The use of these cookies for the purposes described above is based on our legitimate interest to ensure the proper technical functioning of, access to and use of this website or apps and to provide you with the service(s) you have expressly requested.



**Functional cookies.** These cookies are optional and are used to remember the choices you have made, for example the country you visit our website from, your language and any changes you have made to text size and other parts of the web pages that you can customise to improve your user experience and to make your visits more tailored and enjoyable. If you do not allow these cookies, then some or all of these services may not function properly.

**Analytical cookies** are optional and are used to collect information on how Users and Visitors use our website, for example which pages they visit most often, whether they receive any error messages and how they arrived at our website. Information collected by these cookies is used only to improve the use of our website by our Users and Visitors. These cookies are sometimes placed by third party providers of web traffic and analysis services. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies, we will not know when people have visited our site, and will not be able to monitor its performance.

**Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We may use this information to make our website and the information (including marketing information) displayed on it more relevant to your interests and to measure the effectiveness of and marketing or information initiatives. We may also share this information with third parties for this purpose. They remember the other websites you visit, and this information is shared with third party organizations as described below. These are also optional cookies. If you do not allow these cookies, you will experience less targeted advertising.

The Website uses a web analytics service provided by Google Analytics, which uses cookies in order to help us analysing how users use this Website and continually improve users' experience. The information generated by the cookie about the use of the Website (including your IP address) is transmitted to and stored by Google on servers in the United States.

Google uses this information to keep track of how you use this Website in general, compiling reports on website activity for website operators and providing other services relating to website activity and Internet usage.

By using this Website, you agree to the processing of data by Google in the manner and for the purposes described above.

You may refuse cookies in your browser by selecting the appropriate settings. We would however like to point out that in that case you will not be able to use all the features of this Website.

### **Disclaimer**

Our Website's goal is to inform you about the firm and to provide general legal information.

The information provided on this Website is of a general nature and is not addressed to any one in particular. Thus, despite the relevance and veracity of the information, it does constitute neither legal advice, nor a legal opinion and should therefore not be used as a substitute for taking specific and up-to-date legal or professional advice. Moreover, the mere fact of visiting our Website, or asking questions, or making comments electronically does not create a lawyer-client relationship.

Such advice can be obtained by contacting [our lawyers](#) or by sending a specific e-mail request to [us](#).

Moreover, it may happen that our site contains links to other websites; please be advised that these other websites might not have the same policies and terms of use as this one. We do not control and are not responsible for the contents of websites linked to this Website.

We will incur no liability for any actions taken or not taken on the basis of the contents of this Website.

We make all reasonable efforts to ensure that this Website is secured and that the released information is accurate and up to date.

We give however no warranty, express or implied, in this regard.

### **Intellectual property**

This Website, including its design and the entirety of its contents, is covered by Jackye Elombo's intellectual property rights and/or those of her licensors.



Copies of materials present on this website are only authorized for the sole purpose of information with a mention of the address of this Website ([www.jackyeelombo.com](http://www.jackyeelombo.com)). Such copies may not be sold. Any other copy or re-use of these materials is strictly prohibited without our prior written consent.

### **Personal data protection**

Unless otherwise provided in specific contexts, you give your consent to the processing of personal data collected on this Website for the purposes of managing its contact database, sending you newsletters, information about its activities, making statistics and enhancing this Website and its functionalities.

Your personal data (like personal details, e-mail address, etc.) will be treated as strictly confidential. We have taken appropriate technical and organisational security measures against the loss or illegal processing of this data.

In accordance with Luxembourg and European data protection laws, as well as professional rules concerning confidentiality, all personal information collected via this Website will be stored and processed by us on our server, at our offices located at the 170, rue Principale L-5366 Munsbach.

Processing includes any operation or set of operations carried out or not by automatic procedures on data such as the collection, recording, organisation, custody, adaptation or modification, extraction, consultation, use of such data.

We undertake not to transfer your personal data to third parties without your prior consent unless required by law.

You may request access, correction or deletion of your personal data processed by the firm by contacting us at [privacy@jackyeelombo.com](mailto:privacy@jackyeelombo.com).

Upon request submitted to us, you or your beneficiaries with a legitimate interest may receive free of charge, at reasonable intervals and within a reasonable period of time, access to such data, confirmation that such data concern you or will not be processed, the categories of data concerned and the recipient or recipients to whom the data are communicated.

You may also exercise your right to limit the processing and portability of your data.

When we rely on your consent to process personal data, you have the right to withdraw or refuse your consent at any time and when we rely on legitimate interests, you have the right to object.

If you have any questions about your personal data, or if you have any questions or complaints about this privacy policy, please contact our dedicated team at the address mentioned above.

If necessary, you have the possibility to lodge a complaint concerning the data processing operations carried out by us with the competent Luxembourg supervisory authority.



## Privacy notice

The use and disclosure of personal data is important for our law firm and for the individuals whose personal data is processed.

### 1. What is the purpose of this privacy notice ?

This privacy notice ("**Privacy Notice**") aims at giving you information about how the law firm Jackye Elombo – Avocat à la Cour (the "**Law Firm**", "**we**" or "**us**") handles and processes the personal data that it collects from users and visitors visiting the Website ("**User**" or the "**Users**") or which it has obtained about users from a third party, so that Users are fully aware of how and why the Law Firm is using personal data.

This Privacy Notice will inform Users of the nature of the personal information that is processed by the Law Firm and how Users can request the deletion, updating, transfer and/or the access to it.

This list is non-exhaustive, since it is difficult to provide an exhaustive description of all the personal information we process, given the nature of our business and our related activities.

The information set out in this Privacy Notice is prepared on a "best efforts" basis and we endeavour to provide you with as much detail as possible.

If an individual personal information is processed by us as a result of providing legal services (including to individual clients and corporate clients) we will process a variety of different personal information depending on the services provided. Therefore, a special [Privacy Policy](#) explains how the Law Firm may handle personal information about individuals as a result of providing services to third parties and about individuals who apply to work at the Law Firm.

### 2. What personal data do we collect?

Personal data includes any information about an individual from which that person can be identified.

The Law Firm may collect personal information from Users in the course of its business, including through the use of its Website, when Users contact or request information from the Law Firm's staff.

When Users engage our legal or other services or as a result of the relationship with one or more of our staff member or clients please refer to our [Privacy Policy](#).

The Law Firm may collect, use, store and transfer the following categories of personal data:

- **Identification Data:** such as name, surname, social media account, ...
- **Contact Data:** such as email address, telephone number, private and professional address, ...
- **Technical Data:** such as information collected when you visit our website, your IP address, browser type and version, time zone setting and location, information about your use of our website, ...

### 3. How do we use your personal information?

Your information is collected for the following purposes:

- verification of your identity;
- carry out requests made by you on the Website or in relation to our services;
- improve, develop and market new services,
- measure the effectiveness of our content and how Visitors and Users access our Website, and
- use as otherwise required or permitted by law.



#### **4. What is our legal basis to use or process your personal information?**

Like in our business relationships<sup>1</sup>, we rely on your explicit consent as User or Visitor of this Website as our legal basis for processing your personal information.

It is therefore in our legitimate interest to use personal information collected on our Website in such a way to ensure that we provide the very best information and services to our Visitors, Users and ultimately to our clients.

#### **5. Who do we share your personal information with?**

Your personal information may be shared and processed by any member of the Law Firm entity, located in Luxembourg.

We may also share personal information with a variety of the following categories of third parties as necessary, such as:

- Third parties to whom we outsource certain services such as, without limitation, IT systems or software providers, IT Support service providers, document and information storage providers.
- Third party service providers to assist us with marketing insight analytics, such as Google Analytics.

We conduct an appropriate level of due diligence and put in place contractual documentation in relation to any sub-contractor we may appoint to ensure that they process personal information appropriately and according to our legal and regulatory obligations.

#### **6. Our use of cookies**

A cookie is a file of letters and numbers that is stored on your browser or on the hard drive of your computer. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our website.

Our web pages contain cookies that allow us to track receipt of an email to you, to count users that have visited a web page or opened an email and collect other types of aggregate information.

By using this information, we are able to measure the effectiveness of our content and how Visitors and Users access our Website. This allows us to learn what pages of our Website are most attractive to our Visitors and Users, which parts of our Website are the most interesting and what kind of offers our registered Users like to see.

#### **7. Where do we transfer your data to?**

In order to provide our services, we may need to transfer your personal information to locations outside the jurisdiction in which you provide it.

If you are based within the European Economic Area (EEA), please note that where necessary to deliver the services we will transfer personal information to countries outside the EEA.

#### **8. How long do we keep your personal information for?**

We will only retain relevant personal information as long as necessary for the implementation of the purposes described in this Privacy Notice and where required for us to assert or defend against legal claims, until the end of the relevant retention period or until the claims in question have been settled.

Please note that personal information processed for the purpose of our marketing activities will be kept for as long as we receive no "opt-out" or "undeliverable" message.

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<sup>1</sup> • Performance of services: It is necessary for us to use personal information to perform our services in accordance with any contract that we may enter. It is in our legitimate interest or a third party's legitimate interest to use personal information in such a way to ensure that we provide the very best client service we can to our clients and partners. Please note also that specific Terms and Conditions apply when we provide legal services.

• Business administration and legal compliance: It is also our legal obligation to use personal information to comply with any legal obligations imposed upon us (including any Know Your Client or Anti-Money Laundering or Anti-Bribery, conflicts or similar obligations).

• Recruitment: Where we use personal information in connection with recruitment it will be in connection with us taking steps at applicants' request to enter a contract, it is in our legitimate interest to use personal information in such a way to ensure that we can make the best recruitment decisions for the Law Firm.



We may then destroy such personal data records without further notice or liability.

## **9. Confidentiality and the security of your personal information**

The Law Firm is committed to keeping the personal information provided secure. We can assure that your personal information will be treated in strict confidence and that we make every effort to protect your personal information. We have implemented appropriate organisational and technical measures to protect the personal information that we have under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss.

All the actors of the Law Firm including our partners, associates, employees, consultants, workers and data processors (i.e., those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of such personal information.

## **10. How to access your information and your other rights**

You have the following rights in relation to the personal information we may hold about you:

- ***Right of access***

You have the right to ascertain what kind of personal information do we hold about you. If requested, we'll confirm whether we're processing your personal information and, if necessary, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we reserve the right to charge you a reasonable administrative fee.

- ***Right to rectification***

If the personal information we hold about you is inaccurate or incomplete, you are entitled to request to have it rectified. If your personal information has been shared with others, we'll let them know about the rectification to the extent of our means. Where possible and lawful to do so and if you make a specific request, we can also tell you who we've shared your personal information with and give you their contact details.

- ***Right to erasure***

You are entitled to ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If your personal information has been shared with others, we'll let them know about the erasure to the extent of our means. Where possible and lawful to do so and if you make a specific request, we can also tell you who we've shared your personal information with and give you their contact details.

- ***Right to restrict processing***

You can ask us to stop or suppress the processing of your personal information in certain circumstances, such as where you contest the accuracy of that personal information or you object to us. If your personal information has been shared with others, we'll let them know about the restriction to the extent of our means. Where possible and lawful to do so and if you make a specific request, we can also tell you who we've shared your personal information with and give you their contact details.

- ***Right to data portability***

You are entitled, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine-readable format) and to reuse it or to ask us to transfer this to a third party of your choice.

- ***Right to object***

You can ask us to stop processing your personal information, and we will do so, in the following circumstances:

- We are relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing.
- We are processing your personal information for direct marketing purposes.



- ***Right to withdraw consent***

Given the fact that we rely on your explicit consent as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

- ***Right to lodge a complaint with the supervisory authority***

In case of concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the relevant [Supervisory Authority](#).

We are committed to provide you with a response to any request or complaint in a timely manner.

Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the data or where data may be exempt from disclosure due to reasons of legal professional privilege or professional secrecy obligations.

Please note that for every request concerning personal information we may request that you prove your identity by providing us with a copy of a valid means of identification in order to comply with our security obligations and to prevent unauthorized disclosure of information.

## **11. Changes to this Privacy Notice**

We may update this Privacy Notice from time to time to comply with applicable privacy laws or regulatory requirements, to ensure that you are always aware of how we use your personal information and to reflect any changes to our use of your personal information. In case of any such changes, we will post the changed Privacy Notice on our website or publish it otherwise. Where it is practicable, we will notify you by email of any significant changes. However, we encourage you to review this Privacy Notice periodically to be informed of the use of your personal information.

## **12. Contact**

If you have any questions about this Privacy Notice or want to exercise your rights set out in this Privacy Notice, please contact us by:

- sending an email to: [privacy@jackyeelombo.com](mailto:privacy@jackyeelombo.com) ; or
- calling us on : +352 27 76 81 42.