NOTICE ON INFORMATION FOR PERSONAL DATA PROCESSING OF USERS OF LNDS SERVICES AND SERVICE DESK

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1. General

This notice on information for personal data processing of users of LNDS services and service desk (hereafter also "**Notice**"), sets out specific details required under data protection law, in particular Regulation EU 2016/679 of the European Parliament and Council of 27 April 2016, General Regulation on the protection of personal data and on the free movement of such data (hereafter also "**GDPR**"), requires us to provide you with the information contained in this notice to outline what we do, or may do, with your personal data held by this organization. It explains who we are, what we do with personal data collected, details of our data protection officer, when and why we collect personal data, how we use personal data, the legal basis for collecting personal data, and other information required by the GDPR.

2. Contact Details for the LNDS

Luxembourg National Data Service (LNDS)

6, Avenue des Hauts-Fourneaux

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Luxembourg

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The Luxembourg National Data Service is a brand of PNED G.I.E., an economic interest group established by the Luxembourg government and public institutes 2023 (hereafter also "**LNDS**", "**we**" or "**us**").

3. Contact Details of the LNDS' Data Protection Officer

Data Protection Officer

6, Avenue des Hauts-Fourneaux

L-4362 Esch-sur-Alzette

Luxembourg

dpo@lnds.lu

(hereafter also "**DPO**")

4. Scope of the Notice

The Notice is addressed to:

- Individuals who contact LNDS by any means for any purposes
- Individuals who use LNDS' services

5. LNDS Service desk

By creating an account on LNDS domain you will be able to start a project, ask us questions, report issues and obtain support from our team. By creating an account on LNDS, you might also be able to

access one or more services provided by LNDS, for more information on the personal data that LNDS collects when you use specific services, see below in the following sections.

Categories of personal data, lawfulness and purposes of the processing

In order for LNDS to create your account, you need to provide us the following information:

- Name
- Email
- Password

Moreover, LNDS might automatically collect certain traffic data, such as your IP address.

LNDS will process any type of information that you provide through LNDS service desk system, such as your questions, requests, reports, or tickets. **We recommend you not to provide sensitive information via the service desks system**.

LNDS has a legitimate interest in processing your personal data in order to create and maintain your LNDS account, as well as to follow up with you about your questions or assistance requests.

Data recipients

The personal data that you provide to LNDS may be disclosed exclusively for the abovementioned purposes, to the following categories of recipients:

- Cloud service providers (such as Microsoft or Atlassian)

Transfer of data abroad

Where LNDS transfers your personal data outside of the EU/EEA or to countries which do not have a similar level of protection of personal data as the EU, such transfers will:

- be confined to safe addressees, such as recipients or processors that are certified under the EU-US Data Privacy Framework or similar EU-approved certification schemes, or
- if necessary, be covered by appropriate safeguards, such as entering into EC approved standard contractual clauses

Data retention

LNDS will keep your account information until you decide to closed it. If you decide to close or delete you LNDS account, your account data, such as your email and your password, will be deleted immediately. LNDS will store the information you provide via your tickets and your requests for as long as you keep your account open and active. When you decide to close your account, LNDS might still need to keep some information about your tickets and request for a longer period of time in case of compliance with obligations or for accountability purposes.

6. Services

We provide capacities, processes & knowledge sharing to our partners to enable to create value from secondary use of data. Our services are based on enabling the use of existing data in a trustable and secure manner.

6.1 Data Project Consulting and Onboarding

Data Project Consulting and Onboarding service (DPSTART), is the first step to get started with a data project. It is an exercise of two-way communication, with two main objectives: to understand your project scope, goals and anticipated impact, and agree on how LNDS can help the project to succeed.

Categories of processed data, lawfulness and purposes of the processing

Data collection:

- Contact details from you and your organizations, such as names, email addresses, phone number, and similar information to contact you and exchange communications with you and your organization.
- The processing is carried out for the purpose of evaluating the possibility of having your organization onboarded as partner of LNDS in the context of a data project or other types of collaborations. In case the onboarding phase is successful, and your organization becomes a partner of LNDS, the same contact details will be used for communicating and the exchanging information between LNDS and your organization.
- LNDS has a legitimate interest in processing personal data for contacting you and your organization for the purpose of organizing meetings, exchanging information, and pursuing normal day-to-day operations in the context of the collaboration in place between LNDS and your organization.

Data recipients

The personal data that you provide to LNDS may be disclosed exclusively for the abovementioned purposes, to the following categories of recipients:

- Cloud service providers (such as Microsoft or Atlassian)

Transfer of data abroad

Where LNDS transfers your personal data outside of the EU/EEA or to countries which do not have a similar level of protection of personal data as the EU, such transfers will:

- be confined to safe addressees, such as recipients or processors that are certified under the EU-US Data Privacy Framework or similar EU-approved certification schemes, or
- if necessary, be covered by appropriate safeguards, such as entering into EC approved standard contractual clauses

Data retention

In case the onboarding phase is successful and a collaboration between LNDS and your organization is planned, LNDS will keep your data at least for the entire duration of the collaboration, unless your

organization decides to update the contact details. Your data might be kept by LNDS even after the end of the relationship between LNDS and your organization for archiving, auditing purposes or in case of mandatory retention duration set forth by applicable law.

In case the onboarding of your organization is not successful and no collaboration with LNDS starts, LNDS will store your personal data collected via this form for a maximum of 2 years. Within 2 years, LNDS will contact you to know if you and your organization are still interested in remaining in LNDS database for future collaboration. In case you or your organization do not respond or deny interest in remaining into LNDS database, your personal data will be erased immediately.

6.2 Data Management National Community of Practice

Data Management National Community of Practice (DMCoP) service facilitates knowledge exchange and coordination among Luxembourg's data management professionals.

Categories of processed data, lawfulness and purposes of the processing

Data collection:

- Data necessary for the registration to the community and/or to single events, such as name, your organization name and your job position. Moreover, we can ask you to provide additional information in case you are registering to face-to-face events, such as dietary requirements, to provide you a better experience of the events organized by the DMCoP.
- Photos. We might take collective pictures during face-to-face events, after asking your consent, to promote the event on our website or social media webpages.
- Other information collected during the events or via separate surveys. During the events, or in a separate moment, LNDS might ask you to participate to surveys, or voting polls to know your opinion about topic discussed during the meetings and in the context of the activities carried out by the community. Moreover, LNDS aims at creating a knowledge base of the DMCoP via the creation of minutes, slides and video recordings and screenshots during on-line events and make it available to the whole community.

The processing is carried out for the following purposes:

- Managing the participation of the members of the community and/or one-time registrants to a face-to-face event
- Promoting events through pictures taken at face-to-face events, either on LNDS website or on social media
- Building a knowledge base of slides presentations, minutes and speech given at the events by speakers at the events organised by the community

LNDS processes the data on the basis of the following legal grounds:

- Legitimate interest of managing the registration of individuals to the DMCoP community or to events, including face to face events.

- LNDS asks your consent for taking group pictures, especially at face-to-face events, and publish such pictures on LNDS website or other social media platforms for promoting the DMCoP. You have the right to withdraw your consent anytime and without consequences.
- LNDS also relies on his legitimate interest in creating a knowledge base that contains all the discussions and knowledge, including video recordings from past DMCoP events throughout the time.

Processing modalities

The personal information LNDS processes in the context of the DMCoP service are usually provided directly by yourself. For example, when you are compiling the form for the registration to the DMCoP community or to a specific event. Otherwise LNDS might collect your personal data during the DMCoP events and meeting either online or face-to-face, for example, you might be invited to participate in surveys, or polls connected to the topic of the event.

LNDS might record the online meetings of the DMCoP to create a detailed knowledge base available to the data management community in Luxembourg. You will always be advised before the start of the recording, so that you will be able to leave the meeting or close your camera if you wish. You have the right to object to this processing of personal data, based on your individual situation. In that case LNDS will stop the processing of your personal data, unless we have a compelling legitimate reason to continue the processing.

LNDS sometimes collects pictures of participants to the DMCoP, especially face-to-face events to publish such pictures on LNDS website and/or other social media, or in certain cases on paper material so to promote the DMCoP in Luxembourg.

Data recipients

The personal data that you provide to LNDS may be disclosed exclusively for the abovementioned purposes, to the following categories of recipients:

- To the broad public (exclusively group pictures, in case you provide your consent to have your picture published on LNDS website or on social media)
- LNDS service providers (for example, to allow you to register to the events, or for storing in a safe manner personal information that you provided during your participation at DMCoP events)

Transfer of data abroad

Where LNDS transfers your personal data outside of the EU/EEA or to countries which do not have a similar level of protection of personal data as the EU, such transfers will:

- be justified by the establishment, exercise or defense of legal claims, or
- be confined to safe addressees, such as recipients or processors that are certified under the EU-US Data Privacy Framework or similar EU-approved certification schemes, or
- if necessary, be covered by appropriate safeguards, such as entering into EC approved standard contractual clauses

Data retention

Managing the participation of the members of the community:

- LNDS will keep the personal data of the members until these remain registered in the DMCoP community or until they remain active. In case you explicitly request LNDS to cancel your membership to the DMCoP community, the data processed for this purpose will be erased immediately after you request. In case of one-time registrants to a face-to-face event: within 1 month from the end of the event, the personal data will be deleted or anonymized.

Promoting events through pictures taken at face-to-face events:

- Either on LNDS website or on social media or printed material. Group images might be posted or printed, and upon request, after evaluation, these can be deleted for the next version of the promotional material. It might be impossible to delete the already archived pictures.

Reporting and building a knowledge base of slides presentations:

- Minutes and speech given at the events by speakers at the events organised by the community. Once the events are completed, some personal data such as opinions, and speeches, might be stored for the creation of a DMCoP knowledge archive and used for reporting activities. Based on the type of data, the retention period might change accordingly. To know more about data retention time of the data used for building DMCoP archival, and/or (when possible) issue a request for cancellation of data, contact dpo@lnds.lu.

6.3 E-learning Platform

The platform offers flexible, self-paced learning options, allowing you to study on your own schedule.

Categories of processed data, lawfulness and purposes of the processing

Data collection:

- First name and last name
- Username
- Email address
- IP address
- Credentials (i.e., a third-party password)

LNDS relies on essential first party cookies to ensure the proper functioning of its e-learning platform. These cookies are considered strictly necessary. They record the following:

Cookie name	Purpose
csrftoken	Ensures that the requests made to a website are legitimate and come from the authenticated user
edx-jwt-cookie-header-payload	Used for user authentication and authorization.

edx-jwt-cookie-signature	Ensures the integrity and authenticity of the token, preventing tampering
edx-user-info	Maintains user session data and preferences across the edX platform.
edxloggedin	Indicates whether a user is logged in.
opened-language-preference	Stores the user's language preference.
Sessionid	Stores a unique identifier of the session.
KC_STATE_CHECKER	Ensures that the state of the user's session is consistent and secure during the authentication process.
KC_RESTART	Re-creates authentication flow when browser root session is expired
AUTH_SESSION_ID	Tracks the session and links it to the user.
AUTH_SESSION_ID_LEGACY	Ensures the continued operation of older applications.

- Additionally, LNDS shall collect and process the following personal data related to the user's activities on the platform:
- Courses the user enrolls in
- Courses started by the user
- Active courses (i.e., courses a learner is currently active in/ where progress has been recorded in the two past weeks)
- Session data (i.e., time and date of last access, time of login, registration, and logout)
- Badges earned by the user
- Certificate earned by the user
- Current progress levels for enrolled courses
- Current grades for enrolled courses
- Average grade across all enrolled courses marked complete.

The processing is carried out for the following purposes:

- Name, username, email address, IP address, preferred language, credentials and session data are strictly necessary for the functioning of the platform.
- Courses enrolled, started, active, certificates and badges earned, activity logs, course progress, course grade and average grade allows LNDS to enable the user to understand their progress and to issue certificates. The first and last names of the user are also necessary to issue a certificate of completion.

LNDS processes the data on the basis of the following legal grounds:

- Contract: selected personal data outlined above are gathered to facilitate the provision of the service (i.e., access to the e-learning platform and to its modules) as stipulated within the terms and conditions. This processing activity is considered essential for the delivery of the service.

- Legitimate interests: username, IP address, credentials and session data are used to authenticate the user and ensure the security of the platform. This personal data is processed based on LNDS' legitimate interest to ensure the security of its e-learning platform.

Processing modalities

LNDS implements robust technical safeguards and employs stringent organizational protocols to ensure the confidentiality, integrity, and availability of personal data. These measures encompass user authentication upon platform login, secure storage of the data on LNDS' servers and staff training on data protection practices.

Data recipients

To ensure secure and efficient operation of the platform, LNDS collaborates with a third-party service provider that provides the underlying infrastructure. As part of this collaboration, the user's personal data may be accessed by this provider to fulfil its role.

This third-party provider acts as a data recipient and is bound by contractual obligations to process the user's personal data only in accordance with LNDS' instructions, applicable data protection laws, and adequate safeguards.

Transfer of data abroad

LNDS does not transfer any personal data outside of the European Economic Area (EEA). In the event of any modifications regarding transfers of personal data to third countries or international organisations, LNDS pledges to promptly notify data subjects and uphold the processing of their personal data in strict compliance with the provisions delineated in Chapter V of the GDPR.

Data retention

The retention period of the personal data contained in a user account or related to the users' activities depends on whether the user has received a certificate after completing a course:

- Certified Users: If the user has earned a certificate, their data will be retained for four years from their last connection to the platform.
- Non-Certified Users: If the user has not earned any certificate, their data will be retained for two years from their last connection to the platform.

Before your account is deleted, the user will receive a reminder via email.

Regarding the data collected via cookies, the user's personal information will also be retained according to specified durations. Certain cookies will persist only for your session; this applies to the cookie gathering encrypted user data and the security mechanism verifying its integrity. Other cookie-collected data, such as user language preferences, login status, and supplementary user information (e.g., profile picture links), may be retained for up to one month. Additionally, personal data collected to ensure the platform's security is retained for 12 months.

6.4 Identifier Matching and Pseudonym Management Service

The Identifier-matching and Pseudonym Management Service (IPMS) enables the pseudonymisation of sensitive data through a secure decentralised pseudonymisation solution.

Categories of processed data, lawfulness and purposes of the processing

Data collection:

- First name and last name
- Email address
- Name of organisation
- IP address
- Password, authentication and / or third-party credentials

LNDS shall also collect and process the following session data related to the user's activities in the service:

- Time and date of the users' logging into the platform;
- Activity log (i.e., duration of the session and some metadata automatically generated by your activities on our platform).

LNDS relies on essential first party cookies to ensure the proper functioning of its Pseudonymisation Service and are considered strictly necessary. These cookies will record your session interaction and are deleted as soon as the session ends.

Cookie name	**Purpose**	**Duration**
next-auth.callback-url	Stores the call back url	Session
next-auth.csrf-token	Stores the session token for the user	Session
Next-auth.session-token	Stores the session token for the user	30 days (maximum)
KC_RESTART	Creates or restart the authentication flow	Session
AUTH_SESSION_ID	Tracks authentication flow.	Session
__Secure-next-auth.pkce.code_verifier	security cookie	15 minutes
__Secure-next-auth.state	Security cookie	15 minutes

The processing is carried out for the following purposes:

- Name, username, email address, and password/credentials are strictly necessary for the authentication of the user and the functioning of the platform.
- Session data and IP address (i.e., activity log data) allow LNDS to understand the activity within the Service platform to ensure the security of the platform.
- The name of your organization is necessary for LNDS to verify access to LNDS' service and ensure LNDS is serving the correct entity.

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LNDS processes the data on the basis of the following legal grounds:

- LNDS acts as a Controller for the authentication processes for users to have access to the Pseudonymisation Service. For this activity, LNDS processes data on the basis of its legitimate interests, i.e., allowing users to authenticate themselves and use the Pseudonymisation Service (IPMS) - as agreed in the Data Processing Agreement with the respective Controller.
- Note that for other processing activities related to the provision of the IPMS, LNDS acts as a processor on behalf of another entity. In such cases, the processing of personal data is governed by the privacy notice of the respective Controller. This privacy notice does not cover instances where LNDS acts as a processor.

Processing modalities

LNDS implements robust technical safeguards and employs stringent organizational protocols to ensure the confidentiality, integrity, and availability of personal data. These safeguards include the following: multi-factor user authentication upon platform login, secure storage of the data on LNDS' servers and staff training on data protection practices.

Data recipients

- To ensure secure and efficient operation of the service, LNDS collaborates with a third-party service provider that provides the underlying infrastructure. As part of this collaboration, the user's personal data may be accessed by this provider to fulfill its role. LNDS also collaborates with a third-party provider that is responsible for the processing of the forms submitted by the users, and that processes, in this context, personal data submitted by the user in relation to the form.
- These third-party providers act as a data recipient and are bound by contractual obligations to process the user's personal data only in accordance with LNDS' instructions, applicable data protection laws, and adequate safeguards.

Transfer of data abroad

Where LNDS transfers your personal data outside of the EU/EEA or to countries which do not have a similar level of protection of personal data as the EU, such transfers will:

- be confined to safe addressees, such as recipients or processors that are certified under the EU-US Data Privacy Framework or similar EU-approved certification schemes, or
- if necessary, be covered by appropriate safeguards, such as entering into EC approved standard contractual clauses

Data retention

Personal data related to your profile and account, such as name, email, organization, and password, will be kept by LNDS for up to two years, If you do not choose to exercise your right to erasure to delete your profile earlier on platform. After up to 24 months of inactivity of your account, LNDS will send

you a notification to let you know that your profile is scheduled for deletion. If you do not respond to this notification, your user profile will be deleted.

Personal data, such as logs and similar metadata, collected to ensure the platform's security is retained for 12 months.

Personal data collected via cookies will be deleted at the end of a user's log-in session.

6.5 Secure Processing Environment

The Secure Processing Environment (SPE) service protects confidential data reuse by means of providing a secure virtual environment for data handling.

Categories of processed data, lawfulness and purposes of the processing

Data collection:

Personal data in the registration process, such as:

- First name and last name
- Email address
- Name of organisation
- IP address
- Password / authentication information
- Encryption keys (for the upload of encrypted files on the SPE via the LNDS Secure File Transfer
- Technical usage data necessary to perform upload of files to the SPE
- Session recording data, such as users' screen recording, if required by the type of the project

In order to maintain the process, LNDS shall collect and process the session data related to the user's activities in the service (i.e., time and date of last access, time of login, registration, and logout).

LNDS relies on essential first party cookies to ensure the proper functioning of its Secure Processing Environment Service and are considered strictly necessary. These cookies will record your session interaction and are deleted as soon as the session ends.

Cookie name	**Purpose**	
KC_RESTART	Re-creates authentication flow when browser root session is expired.	Session
AUTH_SESSION_ID	Tracks the session and links it to the user.	Session
KC_AUTH_SESSION_HASH	Verifies the integrity of the session	365 days
session_token	Kasm Workspaces' login session cookie	368 days
username	Stores signed-in username	368 days

All cookies are deleted after the session ends.

The processing is carried out for the following purposes:

- Name, username, email address, and password/ credentials are strictly necessary for the multi-factor authentication of the user and the functioning of the platform.
- Session data allow LNDS to understand activity within the SPE platform.
- The name of your organization is necessary for LNDS to verify access to LNDS' service and ensure LNDS is serving the correct entity

LNDS processes the data on the basis of the following legal grounds:

- LNDS acts as a Controller for the multi-factor authentication processes for users to have access to the SPE. For this activity, LNDS processes data on the basis of its legitimate interests, i.e., to allow users to authenticate themselves and use the SPE Service (as agreed in the Data Processing Agreement with the respective Data Controller).
- Note that for other processing activities related to the provision of the SPE service, LNDS acts as a processor on behalf of another entity. In such cases, the processing of personal data is governed by the privacy notice of the respective Controller. This privacy notice does not cover instances where LNDS acts as a processor

Processing modalities

LNDS implements robust technical safeguards and employs stringent organizational protocols to ensure the confidentiality, integrity, and availability of personal data. These safeguards include the following: user authentication upon platform login, secure storage of the data on LNDS' servers and staff training on data protection practices.

Data recipients

To ensure secure, efficient operation and authentication to the service, LNDS collaborates with third-party service providers that facilitate the functioning of the infrastructure. As part of this collaboration, the user's personal data may be accessed by the providers to fulfill their roles.

The third-party providers act as data recipients and are bound by contractual obligations to process the user's personal data only in accordance with LNDS' instructions, applicable data protection laws, and adequate safeguards.

Transfer of data abroad

LNDS does not transfer any personal data outside of the European Economic Area (EEA). In the event of any modifications regarding transfers of personal data to third countries or international organisations, LNDS pledges to promptly notify data subjects and uphold the processing of their personal data in strict compliance with the provisions described in Chapter V of the GDPR.

Data retention

Personal data collected to ensure the platform's security is retained for 3 years, for example logs of users' activities. Personal data collected via cookies will be deleted at the end of a user's log-in session.

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7. Data Subjects Rights

You as data subject are entitled to ask us LNDS, at any time, via the contact details indicated above, confirmation as to whether or not your personal data is being processed, as well as access to them. In case you have provided your consent to the processing of personal data, you can request to withdraw it any time.

You are entitled to the rectification or, when provided, erasure of data and the limitation of or objection to, upon legitimate reasons, the processing. You are also entitled to exercise the right to the portability of the related data which has been the object of automated processing, in case the relationship between you and LNDS is regulated by a contract or it based on your consent.

As Data Subject, you are entitled to lodge a complaint to the Supervisory Authority for the Protection of personal data: the Commission Nationale pour la Protection des Données (https://cnpd.public.lu/fr.html)

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