

Banque de Luxembourg, a Luxembourg société anonyme (public limited company) established and with its registered office at 14, boulevard Royal, L-2449 Luxembourg and registered in section B of the Luxembourg Trade and Companies Register under number RCS 5310 (hereinafter the “Bank” or “we”) respects the privacy of the persons whose personal data it processes and wishes to preserve their trust.

The purpose of this notice is to explain in detail how the Bank processes your personal data when you sign documents electronically using electronic signature platforms.

This notice should be read in conjunction with the [Data protection policy](#) available on the Bank’s website.

To enable its clients to sign documents electronically, the Bank uses the [LuxTrust COSI](#) application and any other platform or means jointly agreed upon between the Bank and its clients.

1. Purposes and legal basis of the processing of personal data

We process our clients’ electronic signature data to enable them to sign contractual and other documents electronically.

The use of electronic signatures serves to formally simplify and speed up the process of providing a legally valid signature to documents. The use of electronic signatures also serves as a means of authentication and proof with regard to contractual commitments.

As such, the legal basis for processing your data is Article 6.1(f) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, i.e. processing necessary for the purposes of the legitimate interests pursued by the Bank and its clients. The legitimate interests pursued by the Bank are to simplify and speed up the contractual commitment and authentication process and, in particular, to prevent fraud.

Client data collected when a document is signed electronically is processed:

- for the purposes of authentication and commercial execution, in particular for the conclusion and execution of agreements and contracts between the Bank and its clients, and for the ancillary and complementary services provided by the Bank to its clients,
- to comply with legal or regulatory requirements, including litigation and the management of complaints,
- to prevent, detect and investigate fraud.

2. What types of data do we process?

The data relating to a client’s electronic signature includes the signature itself and the contact data associated with this signature. This contact data includes: the surname, first name and professional email address of the signatory.

3. How long will your data be stored?

Your electronic signature data is deleted as soon as you stop using the electronic signature service. However, we keep a copy of the documents that you have signed electronically for the duration of their execution and for a maximum period of ten years from the end of the contractual relationship with you.

4. Who receives the data?

The data relating to your electronic signature is transmitted to the LuxTrust COSI electronic signature platform hosted in Luxembourg by [eBRC](#) and to any other platform or means jointly agreed upon between the Bank and its clients. Internally, the Bank does not have access to the identifiers that enable you to sign documents electronically. The Bank only retains a digital copy of the documents that you have signed electronically. The departments involved in providing the required ancillary and complementary services have access to the documents that you have signed electronically. Where permitted or required by law, the Bank may also share these documents with third parties, such as notaries, lawyers or the competent authorities, for the purposes of providing our services.

5. Is data transferred outside the European Economic Area?

No data is transferred outside the European Economic Area when an electronic signature is affixed using the LuxTrust COSI platform or any other platform or means jointly agreed upon between the Bank and its clients, unless an agreement to the contrary exists between the Bank and its clients. With regard to the transfer of documents on which your electronic signature has been affixed, please refer to our general Data Protection Policy, which is available on the Bank’s website.

6. Automated decision-making and profiling

No automated decision-making or profiling is carried out on the basis of your electronic signature.

7. Consequences of not providing this data / Opposition to processing

If you refuse to affix your electronic signature or object to the processing of data relating to your electronic signature, the Bank will not be able to offer you the electronic signature service.

8. Any other questions?

For more information on the protection of your data, please consult our general Data Protection Policy.

9. Information notice updates

You can read the latest version of this document on the Bank’s website. We will inform you of any material changes through our usual communication channels.