

GDPR

SINOLUX STANDARD OPERATING PROCEDURE SOPQA28

1. Purpose of SOP

1.1. To outline the Sinolux's policy concerning GDPR.

2. Data Protection Officer

2.1. The Sinolux's Data Protection Officer (DPO) has the email dpo@sinolux.lu and can be contacted by our customers / partners on GDPR's issues.

2.2. A complaint can be filed with the Luxembourg data protection authority CNPD, in case of concern about Sinolux's Personal Data processing.

3. Reference Law

3.1. Sinolux complies with the applicable European Union General Data Protection Regulation (GDPR) while working in conjunction with customers and partners. Specifically Sinolux applies the Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27th 2016 on the protection of natural persons with regard to the processing of their personal data and on the free movement of such data.

4. Procedures

4.1. The Personal Data processed by Sinolux is the information concerning Customers and Partners.

4.2. Personal Data may include, but is not limited to: personal identification details such as name, surname, email address, domicile/work address, phone number, nationality and citizenship, pictures/photos, types of services received/provided or of products bought/sold, financial and banking information.

4.3. Personal Data are processed for the performance and execution of the contract (i.e. order processing, shipment, payment), to comply with the conditions of accreditation (i.e. practitioner's certificate), for direct marketing purpose related to Sinolux's products and services, for the purpose of providing evidence of a commercial transaction or any other commercial communication.

4.4. Personal Data may be transmitted to third parties (i.e. Sinolux's accounting, shipment companies) and local authorities, with the previous consent of the customers/partners.

4.5. The Personal Data are retained and processed after the end of the contract for a minimum period of 10 years, in order to retrospectively ensure the possibility to verify the commercial transactions.

4.6. The customers/partners are informed of their right to access the Personal Data about them and receive additional information about how they are processed, to rectify any inaccurate Personal Data or complete any incomplete Personal Data, to seek the erasure of their Personal Data when their processing is no longer necessary, to object at any time the processing of their Personal Data for direct marketing purpose, to withdraw their consent to the processing to the extent that the legitimacy of such processing lies on consent.