

# Privacy Policy

Last updated: July 10, 2026

## 1. Data Controller

Confidence House ("we", "our", or "us") is committed to protecting your privacy and processing your personal data in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and applicable Luxembourg data protection laws.

### Data Controller

Confidence House  
7 Avenue de la Liberté  
4601 Differdange  
Luxembourg

Owner: Natalia Wrona

For any questions regarding this Privacy Policy or your personal data, you may contact us through the contact details provided on our website.

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## 2. Personal Data We Collect

Depending on your interaction with Confidence House, we may collect:

- Name
- Email address
- Telephone number
- Billing and invoicing information
- Appointment details
- Messages sent through our contact forms
- Information necessary to provide our services
- Website usage information collected through cookies and analytics (where applicable)

We only collect personal data that is necessary for the purposes described in this policy.

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## 3. Why We Process Your Data

We process your personal data to:

- Respond to enquiries
  - Schedule appointments
  - Deliver our services
  - Manage customer relationships
  - Process payments and invoices
  - Comply with legal and tax obligations
  - Improve our website and services
  - Send communications where legally permitted or with your consent
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## 4. Legal Basis for Processing

We process your personal data based on one or more of the following legal grounds:

- Performance of a contract
  - Compliance with legal obligations
  - Legitimate interests
  - Your consent, where required
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## 5. Data Retention

We retain your personal data only for as long as necessary to fulfil the purposes for which it was collected or to comply with applicable legal, accounting, or tax requirements.

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## 6. Third-Party Service Providers

To operate our business efficiently, we use trusted third-party service providers, including services provided by Google, Microsoft, and Odoo, for functions such as email communication, cloud storage, scheduling, productivity tools, customer management, and business administration.

These providers implement industry-standard technical and organisational security measures and maintain compliance programmes designed to meet applicable data protection laws, including the GDPR where applicable.

Confidence House carefully selects service providers that offer appropriate safeguards for personal data. Where required, data processing agreements or other legally recognised transfer mechanisms are in place.

While we take reasonable steps to ensure that your personal data is protected, no electronic system or method of data transmission can be guaranteed to be completely secure. Confidence House cannot be held responsible for security incidents, service interruptions, or

data breaches that arise solely from the failure, negligence, or unlawful acts of an independent third-party service provider beyond our reasonable control. However, we will fulfil our legal obligations under applicable data protection laws, including notifying the appropriate authorities and affected individuals where required.

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## 7. International Data Transfers

Some of our service providers may process personal data outside Luxembourg or the European Economic Area (EEA). Where this occurs, we ensure that appropriate safeguards are implemented in accordance with the GDPR, such as Standard Contractual Clauses or other approved transfer mechanisms.

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## 8. Your Rights

Under the GDPR, you have the right to:

- Access your personal data
  - Correct inaccurate information
  - Request deletion of your personal data
  - Restrict processing
  - Object to certain processing activities
  - Receive a copy of your personal data (data portability)
  - Withdraw consent where processing is based on consent
  - Lodge a complaint with the Luxembourg National Commission for Data Protection (CNPD)
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## 9. Cookies

Our website may use cookies and similar technologies to improve user experience, analyse website traffic, and support website functionality.

Where legally required, we will obtain your consent before placing non-essential cookies.

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## 10. Data Security

We implement appropriate technical and organisational measures designed to protect your personal data against unauthorised access, accidental loss, misuse, alteration, or disclosure.

Access to personal data is limited to authorised persons who require it for legitimate business purposes.

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

We may update this Privacy Policy from time to time to reflect legal, technical, or operational changes. The latest version will always be available on our website.

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## **12. Contact**

If you have any questions regarding this Privacy Policy or wish to exercise your rights, please contact:

Confidence House  
7 Avenue de la Liberté  
4601 Differdange  
Luxembourg

Owner: Natalia Wrona