



Axon Advisory &
Consulting

Privacy Policy

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1. INTRODUCTION

This Axon Advisory & Consulting privacy notice (“Privacy Notice”) describes how Axon Advisory & Consulting (“Axon”, “we” or “us”) collects, uses, shares, and retains personal information provided to us, or that we collect, when interacting with us.

Axon is a management advisory and consulting firm. Our mission is to help business thriving in quickly changing environment.

Our data privacy representatives can be contacted directly at alexandre.castaing@axon.lu or thomas.baudesson@axon.lu.

2. PERSONAL DATA COLLECTION

2.1. Overview

Personal data type	System	Function
Client employee’s or contractor’s details obtained in the context of our engagements or produced deliverables (name, email, phone numbers)	Network Attached Storage	NAS hosted on premise in Luxembourg
Axon internal employee’s or Axon contractor’s information including personal details gathered in the context of Human Resources activities (name, email, phone numbers, address, social security number, place of Birth, date of birth, ID card number, gender, marital status, education level, financial details) Prospects information including personal details (name, email, phone number, company)	Enterprise resource planning	ERP platform hosted on premise in Luxembourg
Axon internal employee’s or Axon contractor’s information including personal details gathered in the context of resource management (name, email, phone numbers, assignments)	Enterprise resource planning (cloud)	Resource management and planification module.
Client employee’s details obtained in the context of our engagements, produced deliverables, or ongoing discussions with prospects (name, email, phone numbers) Axon internal employee’s information details (name, email, phone numbers, communications)	MS Office 365	Email, calendar and instant messaging
Axon internal employee’s information including personal details gathered for licensing purpose (name, email, phone number)	MS Office 365, Bitdefender, Remarkable	Office automation and security

2.2. Employee’s personal data shared by Axon

Personal information shared by Axon about their employees can be summarized by the Human Resources provided by Fiduciary services, and includes amongst others:

- Declaring any employee onboarding or departure to the local administration.
- Staff contract and compensation details.
- Handling payroll activities on a monthly basis.
- Managing employees sick leave certificates.

2.3. Personal Data collected by MS 365

Axon email capabilities are hosted by Microsoft, an all-in-one Email Hosting, Calendars, Virtual Meetings Services company located in Europe.

Axon only collects the personal information received in the context of the email exchanges that are performed between Axon and the data subjects.

For any queries on how Infomaniak processes or use your personal information please consult the Infomaniak Privacy Policy ([Privacy policy](#)).

2.4. Legal Basis

Axon is considered as Data Controller, in the context of performing our contractual obligation under:

- Employments or service contracts with Axon staff or contractors.
- Service contracts or agreements with partners.
- Being or remaining compliant with legal obligations incumbent to our core business as a consulting firm.

2.5. Security

Axon employs a risk-based variety of technical and organisational measures to keep personal data safe and to prevent unauthorized access to or use or disclosure of it.

- Logical access to personal data are granted based on the need to know / need to have and least privilege principles;
- Strong password management policies are in place in line with international standards;
- Physical access to personal data are secured and granted based on the need to know / need to have principles;
- Regular backups are performed depending on the data sensitivity;
- Antivirus and antispam control are in place.

Axon respects your personal data and will never sell your personal data to third parties.

3. INTERNATIONAL TRANSFERS

Axon may use service providers or partners who are based in non-EU countries. In such cases Axon will inform its data subject of the list of sub-processors based in non-EU countries.

Axon currently uses the following named organisations based in third country (non-EU) as service providers and share the minimal amount of personal information to provide services to you outlined in previous sections.

3 rd country organisation	(non EU) Method to safeguards personal data	Copy of the safeguards
Microsoft 365	Standard Services Agreement	Microsoft Services Agreement
Apple Cloud	Standard Services Agreement	Apple iCloud Services Agreement Apple Privacy Policy

Odoo (planning module)	Odoo Enterprise Subscription Agreement	Odoo Subscription Agreement Odoo Privacy Policy
Prospect Global Ltd – trading as Sopro	Standard Services Agreement	Privacy policy Sopro are registered with the ICO Reg: ZA346877 their Data Protection Officer can be emailed at: dpo@sopro.io .”

4. RETENTION PERIOD

General accounting documents				
1	General obligation to keep records, books and accounting documents of the company, including supporting documents.	10 years	As from the end of the financial year	Commercial code, art. 11, 12, 14 and 16.
2	Financial statements including banking documents, general ledger, clients accounting, suppliers accounting, purchases and sales, inventory accounts, delivery notes and advances, debt and receivables management.	10 years	As from the end of the financial year	
Accounting and tax documents				
3	A company is required to keep records of all supplies or acquisitions of goods or services within the European Community, all imports and exports, as well as all other relevant VAT information. It is generally mandatory to keep at least the following documents: (i) invoices including VAT that are sent and received, (ii) documentation relating to deliveries and acquisitions intra-Community and (iii) documentation relating to the goods imported and exported outside the EU	10 years	As from the closing of the exercise if it is a book, and the creation date if it is a document	Law of the 12 February 1979 on the VAT, art. 65.4.2°
Human resources records (Luxembourg requirements)				
4	Work contract, internships agreements, agreements for scientific visit	10 years	From the end of the contract	Commercial code, article 16
	Documents for accounting for the working hours of the salaried employee	3 years	From the date of creation of the document	Article 2277 of the Civil Code and article L 221-2 of the Labour Code.
	Summary document of on-call duty	10 years	As from the end of the financial year	No legal obligation, recommendation based on the limitation period
	Medical certificates, Leave certificates for family reason	5 years		
	Documents regarding maternity leave, parental leave	10 years		
Medical follow-up with occupational health service (Service de Santé au Travail Multisectoriel)	10 years			
5	Documents identifying foreign nationals (copy): living authorization, work permit	10 years	From the date of termination of the employment contract of the foreign national	No legal obligation, recommendation based on the limitation period provided for in Article 189 of the Commercial Code.

6	Documents concerning the retirement and other related topics. Management of group or individual pension plans (including by the pension fund).	10 years	From the end of the contract	No legal obligation, recommendation based on the limitation period provided for in Article 189 of the Commercial Code.
7	Individual Pension plans, development programs for career and talent development, diversity programs, other HR policies (e.g., rules regarding alcohol and drugs, HIV/AIDS policy), social plans	10 years	From the end of the contract	No legal obligation, recommendation based on the limitation period provided for in Article 189 of the Commercial Code.
8	Data of rejected applicants for employment (for example, application letters, CVs, references, certificates of good standing, driving license, interview notes, evaluations and test results psychological)	2 years	From the last contact with the applicant or the closure of the recruitment process, whichever occurs later.	In the absence of national requirements/ guidelines, alignment with the recommendations of the CNIL (French Data Protection Authority) who considers that this storage period is a maximum of 2 years from last contact with the candidate (CNIL Recommendation n°02-017).
9	All data relating to a temporary worker or with regard to identification, administration, work organisation, social activities and employee representation	5 years	From the last payslip	
10	Reports on employee performance reviews and evaluation interviews (e. g. evaluations, evaluation forms, application for employment of successful candidates, copies of university diplomas and other training courses, correspondence relating to appointments, evaluations, promotions, demotions, agreements concerning the activities of the works council, references, training records)	5 years	From the end of the employment relationship	CNPD recommendations (not documented)
11	Information relating to the identification of employees including Picture, Identity card and Passport	Deletion as soon contract ends.		
Documents related to salaries and wages				
12	Pay slips	10 years	From the date of the creation of the document	The Luxembourg Labour Code does not provide for a specific legal retention period. However, the limitation period for actions for payment of wages of any

				kind is 3 years (Article 2277 of the Civil Code and Article L 221-2 of the Labour Code). In addition, pay slips are in principle supporting documents which must also be kept for a period of 10 years pursuant to Article 16 of the Commercial Code.
13	Documents relating to salaries (salaries, taxes, social security, pay slips, overtime pay, bonuses, reimbursement of expenses, benefits in kind) Severance pay documents (for example, notice and the agreement of the competent authorities, the decisions of the courts of work concerning dismissal, correspondence with the competent authorities concerning dismissal, documents related to the reclassification, the calculations of the compensation of dismissal, etc.)	10 years	From the date of the creation of the document	There is no maximum retention period under the regulations on the protection of personal data. The data will therefore have to be deleted after the period referred to in section 23 of the table.
Medical records / security documents				
14	Special safety and health protection plan Data concerning the labour inspectorate, the committee on health, safety and working conditions, and data concerning declarations of accidents at work.	Duration of the employment relationship		
15	Data required for emergency medical care, social reintegration plans, individual treatment agreements, degree of incapacity for work, workplace accommodation required	Duration of the employment relationship		
Documents related to insurances				
16	Insurance policies	10 years	As from the termination of the insurance policy	Article 44 of the Law of 27 July 1997 on insurance contracts. No legal obligation, recommendation based on the limitation period. In addition, insurance policies are in principle supporting documents that must be kept for a period of 10 years pursuant to Article 16 of the French Commercial Code (see section 1)
Purchasing documents				

17	A company is required to keep records of all supplies of goods or services, all deliveries and acquisitions within the European Community, of all imports and exports, and all others relevant VAT information	10 years	As from the end of the financial year	Commercial code, art.16
18	Debt and receivables management	There is no maximum retention period under the regulations on the protection of personal data. These documents should therefore be kept for as long as the debts and receivables they document are active, and then for the normal period of storage of supporting documents, in accordance with Articles 14 and 16 of the Commercial Code.		
19	Supplier files	There are no specific rules on this matter. If the institute has no more commercial relations with a supplier, its personal information must be deleted 10 years after the last commercial activity.		
Legal files / contracts and agreements				
20	Contracts, agreements and other agreements Lease Contracts for the purchase or sale of real estate Contracts concluded electronically with consumers for an amount equal to or greater than 120 €	10 years (art. 12 and 16 Code du commerce) from the end of the contract. 10 years (art. 12 and 16 Code du commerce) from the end of the contract. 10 years from the end of the contract.		
21	Permits, licences, certificates	10 years	As from the end of the validity of the permit/licences/certificate	Article 189 of the Commercial Code. No legal obligation, recommendation based on the limitation period.
22	Confidentiality and non-competition agreements	10 years	From the end of the contract or the end of the obligations it contains	Article 189 of the Commercial Code. No legal obligation, recommendation based on the limitation period.
23	Lawyers' files Legal files concerning contracts for the provision of services (e.g. by accountants, notaries, architects, brokers, veterinarians, etc.)	5 years for lawyers 30 years/civil litigation 10 years/commercial 10 years for other service providers	From the end of the mandate From the end of the contract of service contract	Articles 2273 and 2276 of the Civil Code. No legal obligation, recommendation based on the limitation period. Article 2270 of the Civil Code and 189 of the Commercial Code. No legal obligation, recommendation based on the limitation period
Other				
24	Photos and videos processed for: (i) Internal HR processes, communication initiatives and training; (ii) Promotional activities on Axon's activities	According to the signed consent form (e.g. 10 years for photos taken during Axon events). The retention periods for photos and videos depicting Axon's employees are foreseen in the consent form available here [-]		