



Lucca Privacy Policy

This privacy policy provides you with information on how Lucca, as controller, processes your personal data (hereinafter referred to as “Personal Data”) for purposes of commercial prospecting or communication (which data, for how long, etc.) and the rights that you have over these Personal Data in this context.

This privacy policy applies to any person who submits their Personal Data via the contact forms on Lucca’s website.

This privacy policy does not apply to the following:

- Processing of cookies. You can find our cookie policy by clicking [here](#)
- Applicants for a job offer or internship with Lucca, for whom the specific privacy policy can be found [here](#)
- Data of employees who use our solutions through their employer:
 - If you are an employee, your request must be submitted directly to your employer.
 - If you are a client, you can submit your request to our client help desk (unless you have signed a contract with a Lucca distributor, in which case you should contact the distributor directly).

We process your Personal Data in compliance with the applicable regulations and particularly in line with the Federal Act of 25 September 2020 on Data Protection (FADP; SR 235.1) and the Ordinance of 31 August 2022 on Data Protection (DPO, SR 235.11).

1. Personal Data processed

Lucca collects and processes the following categories of Personal Data:

- Identification data: identity, email address (particularly professional email address), telephone number;
- Data relating to the person’s professional life: job title, employer’s name.
- Any other Personal Data that you may send to us.

These Personal Data are either collected directly from you or sent to us by third parties, and the latter guarantee for us that they have obtained it and sent it to us legally for processing.



2. Purposes of the processing

These Personal Data are processed by Lucca for the following purposes, as applicable:

- For purposes of developing our client and partner portfolio;
- For the review and implementation of your suggestions;
- For providing or sharing information on our solutions and services, namely through demonstrations, news updates, etc.;
- In any case, for purposes of commercial prospecting or communicating in relation to our solutions and services.

3. Ground for justification

The processing of your Personal Data is justified by overriding private interests, which primarily include responding to your request, promoting our solutions and services to our clients, prospects, and partners.

4. Recipients of the data and transfers

Only people duly authorized by Lucca may access your Personal Data, without prejudice to the possibility of it being sent to regulatory or supervisory organizations in compliance with the applicable regulations.

Any person with access to your Personal Data will be subject to a strict duty of confidentiality. These people include our employees and data processors. Our service providers may also be required to process the Personal Data strictly necessary for the performance of the services that we entrust to them (IT maintenance and hosting, communications, electronic and postal distribution, logistics, etc.).

In certain cases and for certain processing operations, we may use processors based outside of Switzerland or the European Union. In such cases, Lucca is committed to making sure that appropriate measures have been put in place in order to ensure that your Personal Data are covered by an adequate level of data protection (notably through the signature of the European Commission's standard contractual clauses).



5. Data retention

Personal Data is retained for a period of up to three (3) years from your last contact with Lucca.

Beyond this period, the Personal Data will be permanently deleted or will be subject to anonymization operations ensuring that the data subject is no longer identifiable.

If you are a client or partner of Lucca or should you become one, your Personal Data will be retained for the term set in our contractual agreements.

6. Your rights

You have the following rights over your Personal Data:

- **Right to be informed:** the right to obtain clear and precise information on the processing of your Personal Data
- **Right to request the prohibition of specific processing:** the right to request, on legitimate grounds, the prohibition of specific processing of your Personal Data, except where this is required by law
- **Right of access:** the right to request access to your Personal Data
- **Right to correction:** the right to request that your Personal Data be corrected, supplemented, or updated
- **Right to data portability:** the right to request that your Personal Data be sent to you in a conventional electronic format and to transfer it to a third party
- **Right to request a temporary prohibition on specific processing :** the right to request a temporary prohibition of specific processing of your Personal Data
- **Right to deletion:** the right to request the deletion of your Personal Data
- **Right not to be subject to a decision based solely on automated processing,** including profiling
- **Right to lodge a complaint with a supervisory authority:** should you believe that your rights are not being respected, you can file a complaint with the Federal Data Protection and Information Commissioner (FDPIC) (<https://www.edoeb.admin.ch/edoeb/en/home.html>)



7. Contact the Data Protection Officer (DPO)

If you have any questions or complaints, please contact our Data Protection Officer (DPO):

- By emailing dpo@lucasoftware.com
- By writing to: Lucca, FAO DPO, Chemin du Pavillon 2, 1218 Le Grand-Saconnex, Switzerland

If there are any doubts, Lucca may request that you provide evidence of your identity by any reasonable means.

For purposes of accountability and proof of erasure of your Personal Data, and unless a dispute is pending, in which case we shall continue to process the relevant Personal Data, we will retain your erasure request, the effective date of erasure, and the date on which Lucca's response was sent for three (3) years from the effective erasure of the Personal Data.

8. Amendments to the Privacy Policy

On occasion, we may be required to amend this policy, namely in order to make sure that we comply with any regulatory, legislative, censorship, or technical developments. If applicable, we will change the date of the "last update" and will indicate the date on which the amendments were made. Whenever necessary, we will inform you of such changes and/or seek your agreement. We recommend regularly referring to this policy in order to learn about any amendments or updates.

Last updated: 11/10/2024