



Luxra Privacy Policy

At Luxra, we take your privacy seriously. In this privacy policy, we explain which personal data we collect, why we do so, on what legal basis, how we use it, and what rights you have.

1. Who are we?

Luxra International B.V. and Luxra Storage Solutions B.V. (hereinafter collectively: "LUXRA", "we" or "us") are based in the Netherlands and are responsible for the processing of personal data as described in this policy.

Contact details:

- Company name: Luxra International B.V.,
- Postal address: Schoterlandseweg 45, 8451 KA Oudeschoot, The Netherlands,
- Email: info@luxra.ch,
- Phone: +31 655710504,
- Chamber of Commerce number: 52859789 (Luxra International) / 96371331 (Luxra Storage Solutions).

Data Protection Officer: LUXRA has appointed a Data Protection Officer. For questions about data protection, you can contact us via: info@luxra.ch

2. What personal data do we collect?

Depending on your interaction with us, we may collect the following categories of personal data:

2.1 Data you provide yourself:

- Contact details: name, address, email address, phone number,
- Business details: company name, position, Chamber of Commerce number, VAT number,
- Account details: username, password (stored encrypted),
- Payment details: bank account number, billing information,
- Project information: technical specifications, installation locations, energy consumption data,
- Correspondence: emails, chat conversations, phone calls with customer service.

2.2 Data collected automatically:

- Website usage: IP address, browser type, operating system, visited pages, click behavior,
- Cookies and similar technologies: see our Cookie Policy,
- Device information: unique device ID, device type.

2.3 Data from third parties:

We may also receive data from:

- Business partners and suppliers (in joint projects),
- Public sources: Chamber of Commerce register, LinkedIn (for business contacts),
- Credit information agencies (only for large B2B transactions, with consent).

3. Why do we process your data and on what legal basis?

We only process personal data based on a lawful basis as required by the GDPR:

Processing purpose	Legal basis	Retention period
Processing and executing orders	Contractual necessity (art. 6(1)(b) GDPR)	7 years (fiscal retention obligation)
Customer communication and technical support	Contractual necessity	During customer relationship + 1 year
Sending marketing messages	Consent (art. 6(1)(a) GDPR)	Until consent withdrawn
Newsletter	Consent	Until unsubscription
Website analysis and improvement	Legitimate interest (art. 6(1)(f) GDPR)	Max. 26 months
Fraud prevention and security	Legitimate interest	2 years after incident
Compliance with legal obligations (fiscal, administrative)	Legal obligation (art. 6(1)(c) GDPR)	7 years
Dispute resolution and legal procedures	Legitimate interest	Duration of procedure + 1 year
Credit assessment (B2B)	Legitimate interest (after balancing)	Max. 1 year

Please note: Where consent is the legal basis, you can always withdraw it via info@luxra.ch.

4. Profiling and automated decision-making

4.1 Do we use profiling?

Yes, to a limited extent:

- Marketing profiling: We analyze customer behavior to make relevant product recommendations (e.g., which products suit your previous orders),
- Website behavior: We track which pages you visit to improve user experience,
- Legal basis: Consent (you can refuse via cookie banner) or legitimate interest.

4.2 Automated decision-making.

We do not make fully automated decisions with legal consequences (such as automatic credit rejection without human intervention).

For credit assessments for large business transactions, we use automated tools, but the final decision is always made by an employee. You have the right to request human intervention.

5. Do we share data with third parties?

We only share your personal data in the following situations:

5.1 Service providers (processors).

With parties providing services for us:

- Logistics partners: for product delivery,
- Payment processors: for payment processing,
- IT service providers: hosting, cloud storage,
- Marketing and analytics tools: Google Analytics,
- CRM systems.



We have concluded data processing agreements with these parties in accordance with GDPR requirements.

5.2 Legal obligations.

In case of legal obligation, we may share data with:

- Tax authorities,
- Supervisory authorities,
- Police and judicial authorities (upon court order).

5.3 Business partners.

For joint projects, we share data with installers and partners, only with your explicit consent or when contractually necessary.

We NEVER sell your data to third parties.

6. International data transfers

Some of our service providers may be established outside the EU/EEA. In such cases, we ensure appropriate safeguards:

- Adequacy decision: Data to countries with EU adequacy decision
- Standard Contractual Clauses (SCCs): For suppliers in the US or other countries without adequacy decision,
- Additional security measures: Encryption, access controls.

For more information about international transfers, please contact us.

7. How long do we retain your data?

We do not retain personal data longer than necessary for the purpose for which it was collected:

Category	Retention period	Reason
Customer data (contractual)	7 years after last transaction	Fiscal retention obligation
Quote requests (non-customer)	2 years	Commercial follow-up
Newsletter subscriptions	Until unsubscription	Consent
Website analytics data (cookies)	Max. 26 months	GDPR guidelines for cookies
Customer service correspondence	3 years	Quality monitoring
Fraud cases	2 years after incident	Fraud prevention
Legal disputes	Duration of procedure + 1 year	Burden of proof

After expiry of the retention period, data is securely deleted or anonymized.

8. Security of personal data

We take the protection of your data seriously and implement appropriate technical and organizational measures:

Technical measures:

- Encryption: SSL/TLS encryption for data transmission (https),



- Firewall and antivirus software,
- Regular security updates,
- Backups: Daily backups with encryption,
- Access security: Multi-factor authentication for employees.

Organizational measures:

- Access control: Only authorized personnel have access (need-to-know principle),
- Confidentiality declaration: All employees have signed confidentiality agreements,
- Awareness training: Regular GDPR training for staff,
- Processing agreements: With all service providers.

8.1 Data breaches.

Despite all our precautionary measures, a data breach may occur. In case of a data breach:

- We report it within 72 hours to the Dutch Data Protection Authority (if required),
- We inform data subjects immediately if there is a high risk to their rights and freedoms,
- We take immediate action to limit the impact.

9. Your rights under the GDPR

Under the GDPR, you have the following rights:

9.1 Right of access.

You have the right to know whether we process personal data about you and to receive a copy thereof.

9.2 Right to rectification.

You can have incorrect or incomplete data corrected.

9.3 Right to erasure ("right to be forgotten").

You can request deletion of your data, unless we have a legal retention obligation or another legitimate reason to retain it.

9.4 Right to restriction of processing.

You can request restriction of processing in certain situations (e.g., during investigation of data accuracy).

9.5 Right to data portability.

You have the right to receive your data in a structured, commonly used, and machine-readable format (e.g., CSV or JSON).

9.6 Right to object.

You can object to processing based on legitimate interest (e.g., direct marketing).

For direct marketing, an absolute right to object applies - we will then immediately cease this processing.

9.7 Right to withdraw consent.

You can always withdraw your consent for processing for which you have given consent (e.g., newsletter, marketing cookies).

9.8 Right not to be subject to automated decision-making.

You have the right to request human intervention in automated decisions with legal consequences.

9.9 How do you exercise your rights?



Send an email to info@luxra.ch with:

- Your name and contact details,
- A description of your request,
- A copy of your ID (for verification, redact your social security number/photo).

We respond within 1 month (in complex cases, we may extend this to 3 months with justification).

10. Cookies and tracking

Our website uses cookies and similar technologies. For detailed information, see our Cookie Policy.

Summary:

- Functional cookies: Necessary for website functionality - no consent required,
- Analytical cookies: For website analysis (Google Analytics) - consent required,
- Marketing cookies: For personalized advertisements - consent required.

You can adjust your preferences via the cookie banner on our website.

11. Links to external websites

Our website may contain links to external websites. We are not responsible for the privacy practices of these websites. We recommend reading their privacy policies.

12. Data of minors

Our services are aimed at business customers (B2B) and adult consumers. We do not knowingly process data of persons under 16 years of age without parental consent. Please contact us if you suspect we have inadvertently collected data of minors.

13. Changes to this privacy policy

We may amend this privacy policy in response to changing legislation or business processes. The most current version is always available on our website with the date of last modification at the bottom.

In case of material changes (such as new processing purposes), we will inform you via email or a prominent notice on our website.

14. Complaints

Are you dissatisfied with how we handle your data?

1. First contact us: info@luxra.ch - we are happy to resolve this together.
2. Lodge a complaint with supervisory authority: You always have the right to lodge a complaint with the Dutch Data Protection Authority:
 - Website: autoriteitpersoonsgegevens.nl,
 - Phone: +31 88 1805 250,
 - Address: P.O. Box 93374, 2509 AJ The Hague, The Netherlands.

15. Questions?

Do you have questions about this privacy policy or the processing of your data?

Luxra International B.V. / Luxra Storage Solutions B.V.

Email: info@luxra.ch

Phone: +31 655710504

Address: Schoterlandseweg 45, NL-8451 KA Oudeschoot, The Netherlands



This privacy policy has been prepared in accordance with the General Data Protection Regulation (GDPR) and was last updated on 01-10-2025.