

Durando Consulting Sàrl-S processes personal data relating to its website visitors, prospects and customers in accordance with Regulation (EU) 2016/679 (GDPR) and the Luxembourg law of 1 August 2018. This policy explains what data we process, why we process it, how long we keep it and how you can exercise your rights. A French version is also available.

1. Website publisher and data controller

Data controller	Durando Consulting Sàrl-S
Registered office	15, rue de l'Industrie, L-8069 Bertrange, Luxembourg
RCS Luxembourg	B265723
VAT number	LU33846902
Legal representative and publication manager	Philippe Durando
Data protection contact	contact@durando.consulting
Phone	+352 20 21 34 26
Website host	Microsoft Azure - Azure Static Web Apps (Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland)

2. Scope

2.1 This policy applies to personal data processed by Durando Consulting as controller relating to:

- visitors to www.durando.consulting;
- prospects and people who contact us by e-mail or phone;
- contact persons at our customers and suppliers.

2.2 It does not cover data we process on behalf of customers as part of our services (for example, mailboxes in a Microsoft 365 tenant we administer). In that case, we act as a processor within the meaning of Article 28 GDPR. Such processing is governed by the data processing agreement (DPA) signed with the customer and by Article 21 of our General Terms and Conditions.

2.3 We do not request special categories of personal data through the website within the meaning of Article 9 GDPR.

3. Data processed, purposes and retention periods

Purpose	Data	Legal basis (Art. 6 GDPR)	Retention period
Answering a contact or quote request	Name, company, job title, e-mail, phone and message content voluntarily provided by e-mail or phone	Pre-contractual steps; legitimate interest	3 years after the last contact
Performing contracts and providing support	Business contact details, tickets and service history	Performance of the contract	Term of the contract, then up to 10 years where needed for evidence or legal obligations

Purpose	Data	Legal basis (Art. 6 GDPR)	Retention period
Invoicing and accounting	Identity, contact details, invoices, payments	Legal obligation	10 years after the end of the relevant financial year
E-mail marketing	Name, company, business e-mail	Consent; or legitimate interest for similar services supplied to a customer	3 years after the last contact, or until unsubscribe
Optional satisfaction surveys	E-mail, answers	Legitimate interest	3 years
Website operation and security	Technical data that may be processed by the host: IP address, HTTP request data, timestamp and technical information required for operation and security	Legitimate interest	According to hosting configuration and the periods necessary for operation and security
Establishing, exercising or defending legal claims	Data relevant to the dispute	Legitimate interest	Until applicable limitation periods expire

The current website has no embedded contact form and does not use third-party audience analytics or advertising tools. Contact buttons open the visitor's e-mail application through a "mailto:" link.

We do not sell or rent your data. We do not make decisions producing legal effects concerning you solely on the basis of automated processing.

4. Recipients of the data

4.1 Your data is accessible only to people at Durando Consulting who need it for the purposes described above.

4.2 It may be disclosed to processors or service providers to the extent necessary for their tasks:

- website hosting and delivery: Microsoft Azure - Azure Static Web Apps;
- e-mail and collaboration tools: Microsoft 365;
- accounting: our accountant or fiduciary;
- payments: our bank.

4.3 It may also be disclosed to administrative or judicial authorities where required by law.

4.4 If Durando Consulting's business is transferred, data may be passed to the acquirer, subject to the applicable data protection obligations.

5. Transfers outside the European Economic Area

5.1 We favour providers offering safeguards that comply with GDPR. The website is hosted on Microsoft Azure. Microsoft governs processing for its online services through the Microsoft Products and Services Data Protection Addendum (DPA).

5.2 Certain technical processing, support or security operations may involve access to or transfers of data outside the EEA. Where such a transfer applies, it is protected by the mechanisms required by applicable law and the provider's contractual commitments, including European Commission Standard Contractual Clauses and, where applicable, an adequacy decision.

5.3 You may obtain further information on the applicable safeguards by writing to contact@durando.consulting.

6. Security

We take appropriate technical and organisational measures to protect personal data against loss, unauthorised access, disclosure, alteration or destruction. These measures include HTTPS/TLS encryption, multi-factor authentication for administrative access, access-rights management, security updates, backups where relevant, and security measures provided by Microsoft Azure. No transmission or storage method can guarantee absolute security.

7. Data breaches

7.1 Where required by GDPR, we notify the National Commission for Data Protection (CNPd) of a personal data breach within 72 hours after becoming aware of it.

7.2 If a breach is likely to result in a high risk to individuals, we inform the people concerned without undue delay in accordance with GDPR.

7.3 Where a breach affects data we process for a customer, we inform that customer without delay so that it can meet its own notification obligations.

8. Your rights

8.1 Subject to the conditions laid down by GDPR, you have the following rights:

- right of access (Article 15 GDPR);
- right to rectification (Article 16);
- right to erasure (Article 17);
- right to restriction of processing (Article 18);
- right to data portability (Article 20), for data processed on the basis of your consent or a contract;
- right to object (Article 21), in particular to direct marketing;
- right to withdraw consent at any time, without affecting earlier processing.

8.2 To exercise these rights, write to contact@durando.consulting or to Durando Consulting - Data Protection, 15, rue de l'Industrie, L-8069 Bertrange. We reply within the period required by GDPR. We ask for proof of identity only if we have reasonable doubts about the requester's identity.

8.3 Some data cannot be erased while a legal retention obligation applies, in particular for accounting purposes.

8.4 If you believe your rights have not been respected, you may lodge a complaint with the National Commission for Data Protection (CNPd), 15, boulevard du Jazz, L-4370 Belvaux, cnpd.public.lu, or with the supervisory authority in your country of residence.

9. Cookies, trackers and local storage

9.1 In its current configuration, www.durando.consulting does not use advertising cookies, audience-measurement cookies, marketing pixels or social-network buttons that place trackers. Therefore, no consent banner for non-essential cookies is required for the current configuration.

9.2 The website uses browser local storage (localStorage) only to remember the selected language, using the key "dc-lang". This preference remains stored on the user's device and is not transmitted to Durando Consulting solely as a result of this storage.

9.3 If audience analytics, marketing tools, embedded video or other services requiring consent are introduced in the future, they will only be enabled after consent where required, and this policy will be updated.

10. Links to other websites

The website may contain links to third-party websites. We do not control their content or personal-data practices, which are governed by their own policies.

11. Website use and intellectual property

11.1 The website presents Durando Consulting's activities. The information it contains is provided for guidance, may change and does not constitute a contractual offer.

11.2 We endeavour to keep the website available, but it may be interrupted for maintenance or because of hosting or Internet failures. To the extent permitted by law, we are not liable for damage caused by such unavailability.

11.3 The texts, images, logos and other elements of the website are the property of Durando Consulting or their respective owners and are protected by copyright and trademark law. Any reproduction or reuse without prior written permission is prohibited.

11.4 The website does not contain a contact form submitted to a Durando Consulting server. E-mail contact links use the browser's "mailto:" function and open the e-mail application configured by the visitor.

12. Changes to this policy

We may amend this policy to reflect changes in our services, website or applicable law. The current version is published on the website with its update date. Where a material change affects processing relating to our customers, we may inform them by e-mail.

13. Governing law

This policy is governed by Luxembourg law. Any dispute relating to the use of the website falls under the jurisdiction of the courts of Luxembourg City, subject to applicable mandatory rules.

Version dated 12 October 2026.