

**Annex 8: GENERAL NOTICE ON THE PROTECTION OF PERSONAL DATA – CRECHES AND SERVICE D'EDUCATION ET D'ACCUEIL OF THE LUXEMBOURG RED CROSS**

When enrolling your child at the *SEA Leudelange* of the Luxembourg Red Cross, you are required to provide us with your personal data and that of your child. Protecting this data is very important to us. This document is intended to inform you about the use we make of your data and the rights that you have.

**WHO IS RESPONSIBLE FOR THE PROCESSING OF DATA?**

The *Service Maison Relais et Crèches* of the Luxembourg Red Cross, located at 44, boulevard Joseph II, L-2014 Luxembourg is responsible for the processing of personal data.

**WHY DO WE PROCESS YOUR DATA?**

We process your personal data and that of your child for several reasons:

- managing the enrolment of your child at our SEA
- managing the presence and absence of your child
- managing the food service
- managing invoicing
- managing complaints and reporting accidents
- managing our facilities

Your data will be processed:

- as part of the performance of your contract with us,
- to comply with the legal obligations to which we are subject,
- as part of the execution of our public interest mission,
- on the basis of your consent for the taking and/or publishing of pictures (photographs or videos) of your child,
- on the basis of your express consent if you have provided us with information on your child's health (allergies, food intolerances and other pathologies) and in the absence of your express consent, the processing of this health data will be carried out based on the vital interests of your child.

**WHAT KIND OF DATA DO WE COLLECT?**

In accordance with the law, the *Service Maison Relais et Crèches* of the Luxembourg Red Cross only collects the data necessary for the execution of its missions. This data is generally the data that you have communicated to us by means of the enrolment form (the surname and first name of your child, your address, your telephone number, etc.). Other data may be generated or collected in the course of your relationship with the Luxembourg Red Cross (for example: excursions, field trips, etc.).

This data is kept for the time necessary and at most for the period provided for by law.

**TO WHOM DO WE COMMUNICATE YOUR DATA?**

The *Service Maison Relais et Crèches* of the Luxembourg Red Cross treats the communicated data confidentially and only shares it with third parties when necessary and in accordance with the law. These third parties may include other Luxembourg Red Cross entities, the Municipality of Leudelange, the competent administrations and authorities, such as the Ministry of Education, Children and Youth, the Ministry of Health, the National Youth Service, the school as well as service providers, particularly in the context of IT outsourcing. We make sure that your data stays within the European Union.

## WHAT ARE YOUR RIGHTS?

In accordance with the law, you have the following rights:

- **The right to information.** We hope that this document has answered your questions. For any further information, you can contact the person in charge of the *SEA Leudelange*.
- **The right to access your data.** You can access your data and your child's data by contacting the person in charge of the SEA Leudelange.
- **The right to rectify your data and that of your child** if it is incorrect or out of date. You can contact the person in charge of the SEA Leudelange.
- **The right to lodge a complaint** with the National Data Protection Commission (CNPD) if you consider that the processing of your data does not comply with the law.

In certain cases and under the conditions laid down by law, you also have the following rights:

- **The right to request the deletion** of your data and that of your child.
- **The right to request the limitation** of the processing of your data and that of your child.
- **The right to object to the processing** of your data and that of your child for any other legitimate reason (unless there is the a legitimate and compelling reason for the Luxembourg Red Cross to continue processing).
- **The right to portability of** the data you have provided to the Luxembourg Red Cross (i.e. the right to receive your personal data on a machine-readable medium), insofar as this is technically possible.
- **The right to withdraw your consent** to the processing of your child's health data at any time.

If you have questions or wish to exercise your rights, you can contact the person in charge of the *SEA Leudelange* by email: [relais.leudelange@croix-rouge.lu](mailto:relais.leudelange@croix-rouge.lu) or by post:

SEA Leudelange 2, rue du Lavoisier L-3358 Leudelange

You can also contact the Luxembourg Red Cross Data Protection Officer by email: [rgpd@croix-rouge.lu](mailto:rgpd@croix-rouge.lu) or by post:

CROIX-ROUGE LUXEMBOURGEOISE

Data protection

44, boulevard Joseph II

BP 404 L-2014 Luxembourg

In order to comply with the regulations in effect, we will update this document whenever necessary.

**Annex 9: Information on the processing of personal data in form of images (photographs or videos) taken by the SEA Leudelange**

(Given to the legal representative (s) of the minor child concerned)

The protection of your child's image rights and the protection of personal data in accordance with the General Data Protection Regulation (GDPR) is very important to the *Service Maison Relais et Crèches* of the Luxembourg Red Cross.

Your child may be photographed, filmed or recorded by the *Service Maison Relais et Crèches* of the Luxembourg Red Cross during SEA activities. To allow the *Service Maison Relais et Crèches* of the Luxembourg Red Cross to take and use pictures (photos or videos) of your child for the purpose of communicating about the activities, we would like to obtain your consent and would like to inform you in advance of the rights you have.

The photos and video recordings may be used in printed or digital form on various media through which the Luxembourg Red Cross publishes information related to its activities.

**General information:**

*Responsible for data processing:* *Service Maison Relais et Crèches* of the Luxembourg Red Cross, located at 44, boulevard Joseph II, L-2014 Luxembourg.

*Contact person:* Luxembourg Red Cross Data Protection Officer : [rgpd@croix-rouge.lu](mailto:rgpd@croix-rouge.lu)

*Purposes of processing:*

- internal communication by the Luxembourg Red Cross (educational work, educational reflection, internal newsletters and newspapers, activity report, intranet)
- external communication by the Luxembourg Red Cross and the press (magazines, website, the newspaper "*Die Kunterbunte*", the "childhood-youth" logbook).

*Legal basis for processing:* your consent (art. 6.1a GDPR)

*Recipients:* the photographs and video presentations will be stored in the information system of the Luxembourg Red Cross, access to which is restricted to staff duly authorised by the latter. Your data may also be communicated to third parties such as subcontractors (in particular IT service providers) and external service providers of the of the Luxembourg Red Cross (such as graphic designers, press agencies, printers, written media) to the strict extent necessary .

*Retention period:* the photographs and video recordings will be kept for the period necessary for the above purposes.

### **Your rights:**

You can withdraw your consent at any time and request that the *Service Maison Relais et Crèches* of the Luxembourg Red Cross stop using images (photographs or videos) concerning your child on new media (but not media that have already been used for publication), by contacting the person in charge of the SEA Leudelange. If you wish, you can also contact the data protection officer by email: [rgpd@croix-rouge.lu](mailto:rgpd@croix-rouge.lu).

For more information on how the *Service Maison Relais et Crèches* of the Luxembourg Red Cross processes your personal data or to get to know your rights, please consult our information notice intended for beneficiaries of the *Service d'éducation et d'accueil* of the Luxembourg Red Cross at the following address: <http://www.croix-rouge.lu/protection-des-donnees/>.

**Annex 10: Authorisation for taking and/publishing images (photographs or videos)**  
(minor child under the age of 13)

This authorisation is subject to your signature for the taking and dissemination of the image (photograph and/or video) of your minor child whose identity is stated below, as part of the activities of the *Service d'éducation et d'accueil* of the Luxembourg Red Cross in which he/she participates and for the uses specified below.

Child's Surname: \_\_\_\_\_

First Name: \_\_\_\_\_

*Service d'éducation et d'accueil:* Leudelange

**In order to ensure the safety of your child and to fulfil our obligations in terms of quality control, we may be required to take photos/videos of your child (e.g. "badge", portfolio, educational poster, etc.). For us, it is therefore a question of being able to comply with the Grand-Ducal Regulation of 29th July 2017 establishing the national reference framework for non-formal education of children and youth.**

**LEGAL REPRESENTATIVE'S AUTHORISATION**

I, the undersigned (*surname, first name*) \_\_\_\_\_,  
residing at (*address*) \_\_\_\_\_:

**hereby authorise** the *Service Maison Relais et Crèches* of the **Luxembourg Red Cross**, located at 44, boulevard Joseph II, L-2014 Luxembourg (*tick the boxes*):

**1. Authorisation and use of image capture**

- to photograph or film my child, whose identity is stated above, during internal activities of the SEA in which it is taking part.

**If you have not ticked number 1, you can ignore number 2.**

**2. Authorisation and use of images beyond daily SEA activities**

To use, publish, and reproduce those photos, videos or their adaptations, with or without my child's name to illustrate the activities of the *Service d'éducation et d'accueil* of the Luxembourg Red Cross for (*tick your preference*):

- the use of the photos and videos in the context of staff training
- the magazine "Die Kunterbunte", edited by and for children enrolled in the SEA
- the dissemination of photos and/or videos on the following websites:  
Intranet site(s) of the Luxembourg Red Cross; website of the Luxembourg Red Cross; publications edited by the Luxembourg Red Cross such as activity reports, newsletters, journals, flyers, magazines, educational documents, etc. ; publications edited and published by third parties (journals, magazines and other printed or electronic media).
- Use of images in the application DMMI

This authorisation, granted free of charge, is valid worldwide. The *Service Maison Relais et Crèches* of the Luxembourg Red Cross will exercise all exploitation rights of this audio-visual work/recording which will remain the latter's exclusive property.

I certify that I have received an information notice about the processing of personal data in the form of photographs or videos taken by the *Service Maison Relais et Crèches* of the Luxembourg Red Cross (*page 1/2*), that I have read and understood the above information informing me of my rights regarding the taking and publication of the image of my child whose identity is stated above as well as the processing of its personal data.

I acknowledge having that I have full civil rights in respect of the minor named above.

Luxembourg, \_\_\_\_\_

**Date and signature:** \_\_\_\_\_