1. Foreword

The Société Nationale de Certification et d'Homologation (SNCH) is a company mostly owned directly and indirectly by Luxembourg State and offering Type Approval services to the automotive industry in Luxembourg and overseas.

Working predominantly with the automotive industry, SNCH processes and holds only a small amount of personal data and acts thus as a data controller.

This policy explains how SNCH complies with the data protection regulation including the General Data Protection Regulation (GDPR).

2. What is personal data?

Personal data is any information relating to an identified or identifiable natural living person, otherwise known as a "data subject". A data subject is someone who can be recognized, directly or indirectly, by information such as a name, an identification number, location data, an online identifier, or data relating to their physical, physiological, genetic, mental, economic, cultural, or social identity. These types of identifying information are known as "personal data".

3. Requesting your personal data

Where we ask for your personal information we will:

- let you know why we need it;
- only ask for what we need, and not collect excessive or irrelevant information;
- ensure that it is kept safe and secure and only accessible by those who need it;
- let you know if and how we will share it with other organizations, and whether you may refuse your data to be shared;
- only keep it as long as we need to;
- make sure it is accurate and kept up to date;
- not make it available for commercial use.

To help us to keep your information reliable and up to date, we would ask you to:

- give us accurate information;
- inform us as soon as possible about any changes (such as a new address…).

We are committed to providing the best and most efficient service. We may share personal information within our organization or with other bodies within the Luxembourgish Government where it would not be inconsistent with the purposes for which we collected it, and/or where we are required or permitted to do so by law.

See the section "Do you share information with third parties?" for further information.

4. What categories of data will be processed by SNCH?

SNCH routinely processes small amounts of personal data in the course of its everyday activities.

The following are the type of data held by the SNCH where personal data may be held.
- Personal data : name, surname, phone number, email address, address, nationality, date of birth, copy of passport or ID card,
- Work data : work email, work address, work phone number, CV, educational background,
- Payroll data : IBAN, social security number, training, place of birth.

5. Purposes of the processing

- Application of a technical service and recognition process (assessment, initial audit, surveillance audit, monitoring),
- Application of a manufacturer and assembly plants,
- CoP and witness audit,
- Review of the files,
- National homologation process,
- Upload of certificates and files,
- Qualification / acceptation of auditors,
- Treatment of incoming invoices,
- Request of information (by using the website like or writing an email),
- Appeal and complaints,
- UIC processes.

6. Legal basis for the processing of your personal data

Depending on concerned processing operations, the processing of your personal data is based on one or several of the following conditions:

- you have given your consent to the processing of your personal data for one or more specific purposes (e.g. sending newsletters, …) ; or
- the processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract ; or
- the processing is necessary for compliance with a legal obligation to which SNCH is subject; or
- the processing is necessary for the purposes of the legitimate interests pursued by SNCH or by its third party (e.g. combat fraud, security or safety issues, cooperate with law enforcement bodies, improve customer experience, develop new services and products, enforce our policies).

7. How is the information held?

Personal data held by SNCH will predominantly be in electronic format only, although there may be some legacy paper records.

We take information security seriously and will protect your personal data from unauthorized access, accidental loss, destruction and damage. We carry out regular reviews and audits to ensure that our methods of collecting, holding and processing personal data meet the industry good practice. We will only transfer your personal data overseas where appropriate safeguards are in place to protect it.

8. How long do you keep my personal information?

That will largely depend on the reason for holding it in the first place, but in practice, we only hold personal data for as long as legally required or as long as needed to process requests or service an agreement and as required to comply with audit processes.

9 Do we share information with third parties?

SNCH will only share your personal information where there is a justified and necessary reason to do so.

- sharing your information with the Ministry of Mobility and Public Works; or
- sharing your information with Luxembourgish Government engaged in pursuing investigations concerning the protection or detection of crime; or to protect the misuse of public funds;
- sharing with auditors (ie Olas, financial auditors, external auditors…) or lawyers; or
- to assist Law enforcement and other government agencies engaged in the protection or detection of crime, or to provide evidence in criminal or civil prosecution cases; or
- software developers employed directly by the SNCH to carry out development and maintenance work on the SNCH web tools

Please be aware that in these cases, SNCH will make an independent assessment of the third party request, but has not to seek your approval to share this information beforehand.

Electronic data is stored using secure hosting arrangements both within SNCH and using solutions offered by third-party providers. Hosting organizations and contractors that hold data on our behalf (which may include some personal data), have a limited role in relation to processing the data held; will be fully compliant with GDPR and other legislation; and where necessary, be party to a sharing agreement with SNCH.

10. What rights do I have on my personal data?

You have different rights, some of them being subject to conditions imposed by law. You have the right to request from the SNCH copies of the personal data that we hold about you at any time by making what is known as a 'subject access request'. You also have the right to ask for your personal data to be rectified or erased. You may also ask the SNCH to restrict processing of your personal data and have the right to object to processing of that data as well as the right to data portability.

Please write to us at direction@snch.lu

Please note that before we can act on your request, you will need to supply proof of your identity.

In order to process your request and perfectly identify you, please provide us with your name and SNCH may ask you, in case of doubt, for a signed and dated copy of your ID card / passport.

SNCH will usually respond to subject access requests within one month of receipt, but may take up to 2 months in the case of complex and/or numerous requests.

If you wish to raise a complaint on how the SNCH has handled your personal data, you can contact the supervisory authority for data protection in Luxembourg:

<div align="center">

Commission Nationale pour la Protection des Données
15, boulevard du Jazz
L-4370 Belvaux

</div>

11 Disclaimer

Please note that in the course of your communications with SNCH, any advice or comments provided, whether that by email, letter, or verbally, should only be considered as opinions. Interpretation of the law is the sole prerogative of the courts.