

Declaration on the protection of citizen's personal data (ACN-DéclCitoyens-EN)

1 General information

Last update	25/11/2025
Commitment of the communal administration	Respecting the privacy of every individual is one of the objectives of the municipality, which is committed to protecting your personal data. The communal administration wishes to inform you in complete transparency about the way in which it collects, uses and protects your personal data, and implements appropriate means to ensure the protection of your data and compliance with requirements.
Area of application	This data protection declaration applies to all personal data transmitted to the communal administration and to data processed by the communal administration in the course of its activities. It does not cover staff or subcontractor data.
Responsible for processing	Administration Communale de Niederaanven (ACN) Tél. : +352 34 11 34-1, Fax. +352 34 11 34-22 18, rue d'Ernster L-6977 Oberanven http://www.niederaanven.lu
DPO contact	The data protection officer itrust consulting s.à r.l. dpo@niederaanven.lu
Modification	The communal administration may amend this privacy statement by publishing an updated version.

2 Principles of the communal administration

The municipality attaches great importance to the protection of personal data and respect for privacy. This is confirmed by the implementation of a data protection policy specific to the administration.

The municipalities administration's approach as a public service is based on six principles:

1. The communal administration will always use your personal data in a fair and trustworthy manner.
2. It aims to take all appropriate technical and organizational measures to protect the security of your personal data, and in particular the confidentiality, integrity and availability of your personal data.
3. You have the right to be informed about how your personal data is used. The communal administration will be transparent with you about what data is collected and how it is used.
4. If you have any questions about how your personal data is processed, please contact us so that we can answer your questions as soon as possible.
5. All necessary measures are taken to protect your information from misuse and to keep it secure.
6. The communal administration cooperates with the National Data Protection Commission (hereinafter referred to as the CNPD), based in L-4361 Esch-sur-Alzette, 1 avenue du Rock'n'roll.

3 Rules of conduct for the communal administration

3.1 What is the mission of the communal administration?

Your personal data is used solely for the purposes of the communal administration's public service mission. This consists of:

- improving its services to citizens and developing further towards an efficient and easily accessible administration;
- offering a high-quality service to the municipality for certain administrative procedures.

For further information, please visit <http://www.niederanven.lu>.

3.2 What are the purposes of the processing?

The collection and processing of your personal data is limited to the following purposes:

- Fulfilling the legal obligations of a communal administration;
- Providing services to citizens;
- Ensuring the integrity of citizens' RNPP (National Population Register);
- Uploading documents to GESCOM;
- Managing residents' arrival and departure declarations;
- Manage divorce files in accordance with legal recommendations;
- Manage the establishment of partnership agreements celebrated in the municipality;
- Manage and archive administrative documents for citizens;
- Manage building permit applications submitted by citizens;
- Manage the personal data of social housing applicants;
- Manage the personal data of students participating in music lessons;
- Process applications for admission to the CIPA and manage the waiting list;
- Generate civil status documents (death certificates, birth certificates, marriage certificates, etc.);
- Use the personal data of applicants for the cost-of-living and heating allowance to manage their applications;
- Collect personal data for the creation of payment mandate forms for the ecological bonus and pampers;
- Manage concessions in the municipal cemetery;
- Manage dog registrations by their owners with the municipality;
- Draw up a list of deserving athletes;
- Collect personal data from participants in the sports night event;
- Analyzing the files of pupils and students registered for the student allowance;
- Processing subsidy applications from residents of the municipality for the purchase of electric bicycles;
- Managing personal data for the organization of municipal festivals;
- Collecting wood order forms and transferring them to the forestry centre;
- Draw up rental contracts for municipal halls between the municipality and individuals;
- Manage applications for renewable energy subsidies;

- Calculate the amount of the subsidy, draw up a list of beneficiaries, and pay out the subsidies;
- Manage student transportation in the municipality by drawing up a list of children to be transported;
- Manage data on staff members (dashboard) and residents of Niederaanven to feed into the Hoplr network;
- Process the telephone numbers of ACN staff members who use the Hoplr dashboard;
- Ensure the schooling and safety of children;
- Draw up a list of children in the municipality for the monitoring of compulsory schooling in accordance with the law of 06/02/2009 on compulsory schooling;
- Enrol students in school from the age of 3 (if parents wish) and children who have reached the age of 4 on September 1. (law of February 6, 2009, on the organization of basic education);
- Register young parents to receive information and advice during pregnancy and the child's first year;
- Day-to-day management of the Niederaanven municipal administration;
- Manage mail for staff via GESCOM and on paper;
- Ensuring the safety of people and property;
- Preparing invoices for garbage collection based on a report sent by CCN, the company responsible for garbage collection;
- Processing requests (via form) for the provision of a green waste container and then invoicing;
- Analyze requests for road permits made by citizens;
- Study the needs of people affected by construction sites, prepare expert reports for compensation due to construction sites;
- Manage administrative formalities for employment contracts for students working for the municipality during the summer period;
- Draw up lists of citizens who are members of advisory committees and monitor attendance at committee meetings for payment purposes;
- Prepare the municipal council (draw up the agenda, municipal councillors' files, etc.);
- Archive deliberations;
- Manage the drafting of sales agreements for real estate owned by the municipality and sold to individuals;
- Manage the drafting of lease agreements for municipal land leased to individuals;
- Manage the revenues of the municipality of Niederaanven;
- Prepare and submit to the court payment orders for unpaid bills from residents;
- Manage the payment of property taxes for residents of the municipality;
- Manage the billing of water consumption by residents of the municipality;
- Issue payment reminders for unpaid bills by residents;
- Set up direct debit mandates for the payment of bills issued by the municipality (water, waste, canals, etc.) at the request of citizens;
- Issue invoices for water, sewerage, and household waste taxes;
- Manage residents' addresses for garbage collection;
- Track payment for ski trips for students registered by their parents;
- Issue invoices and send them to tenants for payment;
- Issue and send dog tax invoices to residents of the municipality;
- Promote events in the area, simplify access to public services and facilitate participation;
- Host the OS Centrest's personal data on an internal server.

The data may also be used for statistical, research, and archiving purposes in accordance with applicable law.¹

3.3 Who is affected by data processing?

Affected are :

- all citizens residing in the municipality of Niederaanwen;
- participants in activities organized by the municipality;
- guests and participants in events;
- all citizens providing Personal Data (PD) on the municipality's website;
- any person concerned by Book 1, Title 2 of the Civil Code within the territory of the municipality of Niederaanwen;
- customers and suppliers of the municipality of Niederaanwen.

3.4 How is your personal data collected?

With regard to persons referred to in point 3.3, data is collected from:

- various types of forms (general affairs, technical services, etc.)
- registration or social assistance applications;
- information you provide to the communal administration;
- the citizen database managed by the communal administration;
- data collected on the communal administration's website.

3.5 What personal data does the communal administration have?

'Personal data' refers to information that allows you to be identified or makes you identifiable. This may include:

- personal data of citizens, course participants, legal representatives and professionals (surnames, first names, registration numbers, addresses, telephone numbers, family status, etc.) as well as service providers or organizations involved in the services;
- payment data;
- documentation, photos and videos of communal administration activities, including images;
- information on any specific needs or requests for assistance;
- information in the event of security incidents (images and videos taken on the communal administration's premises).

3.6 How long is data stored for?

Your personal data will be stored for the period necessary to fulfil the aforementioned purposes.

¹ Articles 5 et 89 (paragraphe 1) du GDPR.

However, these periods may be extended due to the need to comply with legal limitation periods. The storage periods have been defined in the processing register and can be consulted at the communal administration offices.

Depending on the purpose or the provisions of archiving laws, the retention period may be extended in the case of a public interest mission. Certain images are retained and used for historical purposes.

In anonymized form, your personal data may be used for statistical purposes beyond any retention period indicated above.

Data type	Retention period	Deletion time after a legitimate request
Civil status, identity, identification data, images, etc for RNPP.	Unlimited	1 day
Common personal data.	Unlimited	n.a.
Civil status, nationality, place of residence for divorce, PACS, etc.	Unlimited	Not possible for deeds. Supporting documents may be deleted one day after request and after registration of the deed.
Administrative documents for municipal residents for PAP/PAG-	Data retained since 2011	n.a.
Information about the owners of the building or cadastral parcel when applying for a building permit.	Data retained since 1970	n.a.
Surname, first names, and contact details of social housing applicants.	5 years after last contact	1 day
List of participants in music classes.	2 years for registration forms. Immediate termination of the contract at the end of the contract period.	1 day
Civil status, identity, identification data of persons registered on the list for CIPA.	Until the death of the person concerned	1 day
Personal information about recipients of the "allocation vie chère".	Data stored since approximately 1996 (data expected to be deleted after 2 years) Heating allowance: 2 years	n.a.
Bank details of beneficiaries of a subsidy.	5 years for the eco bonus 2.5 years for the pampers bonus	n.a.
Name, first name, and contact details of the person paying for the burial plot.	Unlimited	n.a.
Current information (name and address) & insurance of the owner of a dog.	Upon departure of the resident or death of the dog	n.a.
First and last names of athletes.	No retention	n.a.
First and last names of participants in "nuit du sport".	Data retained since 2011	1 day
Personal data of recipients of grants and subsidies.	Since 1976 Minimum 10-year retention	1 day
Personal information of residents who have received an Emobility bonus.	1 year	1 day
Personal data of people registered for municipal celebrations.	2 years	1 day
Personal data of room renters.	Unlimited	1 day

Data type	Retention period	Deletion time after a legitimate request
Amount of the grant received by the beneficiary.	Unlimited for business needs and tracking of applications for renewable energy and rainwater allowances	n.a.
Amount of subsidies received.	10 years	n.a.
List of students registered for school transportation.	1 year	1 day
Last name, first name, address, email, phone number, description for hoplr.	Deletion of data when deleting the user account	1 day
Children's identification details for the school.	Since 2002	1 day
Personal data of students enrolled in the municipal school.	Since 2000.	1 day
Personal data such as surname, first name, date of birth, address, and nationality of parents. Date of birth of the child for babyPLUS.	After the child's first birthday	2 days
Location data for the management of the municipality.	2 months for geolocation data and 3 years for working time data	1 day
Economic and financial information (income, financial situation, tax situation, etc.) for the mail handling.	Unlimited in GESCOM	1 day
Video surveillance footage.	15 days	n.a.
Civil status, identity, identification data, etc for the waste management.	1 year	1 day
First and last name of the applicant (building owner).	Retained since 1970.	n.a.
Student employment contract.	10 years	n.a.
Personal details (first name and last name) of advisory committee members.	Since 1988	No data deletion, as there is a legal obligation to retain data under municipal law dated December 13, 1988.
Information about municipal councillors.	Since 1997	n.a.
Names of persons appearing in the proceedings.	Unlimited	n.a.
Personal data of buyers of municipal land.	Preservation of notarial deeds since 1900	n.a. because it is not possible to erase data.
Personal identification data for the rental of land.	5 years after the end of the lease	1 day
Unpaid debts by name.	10 years	n.a.
Customer personal data for the payments.	2 years after the end of the proceedings.	n.a.
Personal data of municipal residents relevant for property tax.	Retention of the 1900 tax roll. Retention of property tax bills since 1990.	n.a.
Information on household water consumption.	1 year	n.a.
Customer personal data for direct debit mandates.	2 years after payment	n.a.
Customer personal data for invoice management.	Since the appointment of the processing manager in 2009	n.a.
Customer personal data for invoice management.	Since around 1990	n.a.

Data type	Retention period	Deletion time after a legitimate request
Personal data of citizens for CNN.	Since the appointment of the processing manager in 2009	n.a.
Children's identification data for "classes de neige".	Since my appointment 2009 Retention of accounting documents: 10 years	n.a. because payment is tracked
Personal data of owners renting out their homes in Niederanven.	Since the appointment of the processing manager in 2009	n.a. because of invoice payment
Personal data on dog owners in the municipality.	Preservation of the 1900 role. Since my appointment in 2009	Can be deleted after the dog's death (1 day)
Personal data of owners with second homes in the municipality of Niederanven.	Preservation of the 1900 role. Since my appointment in 2010	Can be deleted after the dog's death (1 day)
Connection data for website management.	1 year	n.a.
Personal data of OS Centrest allowance recipients.	At the request of the OS Centrest when the beneficiary is removed from the register	n.a.

3.7 With whom is your personal data shared?

As a general rule, your personal data will not be shared outside the communal administration and state entities managing the citizen database. Only state officials and communal administration staff who need your data to perform their duties will have access to it. However, there is an exception in the context of the BabyPLUS service, where your data such as your child's surname, first name, address, date and place of birth, and the nationality of the parents are passed on to Initiativ Liewensufank a.s.b.l..

In the context of investigations by other authorities (e.g., police investigations, courts), the communal administration may be required to provide them with the information necessary for their investigation.

If you participate in events, we will forward the necessary data to the organizers with your consent.

3.8 Is your personal data transferred to third countries (outside the EU and partner countries)?

None of your personal data is transferred to organizations based outside the EU, with the exception of information necessary for registration for events (e.g., contests or internships) in these third countries.

3.9 How is your personal data protected?

Access to your personal data is restricted to prevent unauthorized access, modification, or misuse. Access is only granted to staff members who need it to perform their duties.

3.10 What are your rights and how to exercise them?

The legal rules on the protection of personal data, in particular the rights granted to data subjects, apply under the relevant conditions and subject to the exceptions and derogations provided for.

If you have any questions about the processing of your data or wish to exercise your rights, please contact the data protection officer of the communal administration,

- By sending an e-mail to the following address: dpo@niederanven.lu;

- Or by registered mail to:

Administration Communale de Niederanven

Tél. : +352 34 11 34-1,

Fax. +352 34 11 34-22

18, rue d'Ernster L-6977 Oberanven

Please enclose a legible and valid copy of your identity document with your request, as well as that of the person you represent, if applicable.

If you have any questions, you can also contact the person who processed your data directly.

You have the right to:

1. request a copy of the personal data that the communal administration holds about you;
2. request that the communal administration correct, update, or delete your personal data from its files, and
3. report any misuse of your personal data.

If you request that your data is deleted, the communal administration will check that there are no other purpose or rights of another data subject that would require it to be retained. In this case, the decision must be justified.

If you request a copy of your file, the communal administration will review it to remove any information about other persons.

If you believe that your personal data has not been processed in accordance with the law, you have the right to contact the CNPD (www.cnpd.lu) or to file a complaint with them.