

Privacy Policy

Information on the processing of personal data pursuant to Art. 13 / 14 GDPR

Bernadotte Consulting vGmbH · www.bernadotte-consulting.com
GDPR · BDSG · EU AI Act · Supervisory authority: CNPD (Luxembourg)
Last updated: June 2026 · Version 2.1



Our understanding of data protection

Protecting your personal data is a central concern for us. As a consultancy for data protection and the safe use of AI, we see it as our duty to lead by example. This Privacy Policy transparently describes which data we process, when, on what legal basis and for what purpose – and what rights you have in this respect.

We take a holistic view of data protection along three pillars: analogue data, website & online presence, and the use of artificial intelligence. This Policy is structured according to the same principle.

Three pillars, one goal: we handle your data in the analogue world, on our website and when using AI according to uniformly high standards.



1 • Controller and contact

The controller responsible for data processing within the meaning of the GDPR is:

Bernadotte Consulting vGmbH
11, Rue Kneppchen
L-8234 Mamer, Luxembourg

Trade register (RCS): 241943 · VAT ID (TVA): 31925007
E-mail: sale@bernadotte-consulting.com
Management: Anja Bernadotte

Data Protection Officer

For any questions regarding data protection, you can reach us at sale@bernadotte-consulting.com. Where a Data Protection Officer has been appointed, you may contact them directly; we will provide the current contact details on request.



2 · Processing along our three pillars

Below we describe the processing of your data separately for the three areas in which personal data typically arises.

PILLAR 1

Analogue Data

Data outside digital systems – from contact, contracts and the business relationship.

- Master data: name, address, telephone number, function and company affiliation that you provide to us by phone, in writing or in person.
- Contract and engagement data: information from the initiation and handling of consulting services, correspondence, appointment and file notes.
- Billing data: bank details as well as documents to be retained under tax and commercial law.
- Legal bases: contract or pre-contractual measures (Art. 6(1)(b)), legal obligation (lit. c) and legitimate interest in proper business operations (lit. f).

PILLAR 2

Website & Online

Data arising when visiting and using www.bernadotte-consulting.com.

- Server log files: IP address, date and time, page accessed, browser type and referrer – processed to securely provide the website (Art. 6(1)(f)).
- Contact: if you write to us by e-mail, we process your details solely to handle your enquiry (Art. 6(1)(b) or (f)).
- Cookies & analytics: we set strictly necessary cookies on the basis of our legitimate interest. Optional cookies and reach measurement only with your consent (Art. 6(1)(a)), which you may withdraw at any time.
- Embedded services: external content and links are, where used, transparently indicated; the privacy notices of third-party sites apply to those sites.

PILLAR 3

AI Use

Data in connection with the use of artificial intelligence in our processes.

- Principle: we only use AI where this is possible in a data-protection-compliant and transparent manner. Personal engagement data is fed into AI systems only on a secure legal basis and not without appropriate safeguards.
- Transparency (EU AI Act): where you interact directly with an AI system, we will inform you. AI-assisted results are reviewed before use.
- No use for training purposes: your personal data is not used to train third-party AI models. We give preference to services that contractually guarantee a training-exclusion option ("no-training" / no model training).
- No automated individual decisions: there is no decision based solely on automated processing producing legal effects concerning you (Art. 22 GDPR).
- Processors: the AI and IT service providers we use are carefully selected and bound by contract pursuant to Art. 28 GDPR.



3 · Third-party services and their policies

We integrate certain third-party services on our website. In doing so, technical data (in particular your IP address) may be transmitted to the respective provider. We limit the use of such services to what is necessary and disclose them transparently here.

Services currently in use

- Google Fonts (Google Ireland Ltd. / Google LLC): used to display fonts consistently. When the fonts are loaded, your IP address is transmitted to Google. The legal basis is our legitimate interest in an appealing presentation (Art. 6(1)(f)). For details, see Google's privacy policy (policies.google.com/privacy).

Data-minimisation recommendation: embed fonts locally (self-hosting) so that no IP address is transmitted to Google when the page is loaded. We apply this consistently for our own website.

Principles for all third parties

- The privacy policies of the respective provider apply in addition; we have no influence over their content.
- Where a service relies on your consent (Art. 6(1)(a)), it is loaded only after your approval; consent can be withdrawn at any time.
- For transfers to the USA or other third countries, we rely on an adequacy decision or EU Standard Contractual Clauses (see section 5).
- We currently use no web analytics, no tracking and no advertising cookies.



4 · Recipients and data transfers

Your data is transferred only where this is necessary or where you have consented. Recipients may include:

- Processors: carefully selected IT, hosting and AI service providers, bound by contract pursuant to Art. 28 GDPR.
- Professional advisers: e.g. tax advisers, where required to perform the contract.
- Authorities and courts: only where there is a legal obligation.

Transfers to third countries

Where data is transferred to countries outside the EU/EEA, we ensure an adequate level of protection – for example through an adequacy decision of the EU Commission or through EU Standard Contractual Clauses with supplementary safeguards.

5 · Retention period

We store personal data only for as long as is necessary for the respective purposes. Thereafter the data is deleted, unless statutory retention obligations (in particular under commercial and tax law) apply. Server log files are deleted or anonymised after a short period; data based on consent is deleted upon your withdrawal.



6 · Your rights as a data subject

Under the GDPR, you have in particular the following rights:

- Access to the data stored about you (Art. 15).
- Rectification of inaccurate data (Art. 16).
- Erasure of your data, unless retention obligations apply (Art. 17).
- Restriction of processing (Art. 18).
- Data portability in a commonly used format (Art. 20).
- Objection to processing based on legitimate interests (Art. 21).
- Withdrawal of consent given, with effect for the future (Art. 7(3)).

To exercise your rights, an informal message to sale@bernadotte-consulting.com is sufficient. We may request additional information to verify your identity.

Right to lodge a complaint with a supervisory authority

Without prejudice to any other remedy, you have the right to lodge a complaint with a supervisory authority, in particular with the competent authority in Luxembourg: Commission Nationale pour la Protection des Données (CNPD), 15, Boulevard du Jazz, L-4370 Belvaux.



7 · Data security and updates

Technical and organisational measures

We implement appropriate technical and organisational measures to protect your data against loss, misuse and unauthorised access. Data transmission on our website is encrypted. Our staff are bound to confidentiality and trained in handling personal data.

Obligation to provide data

Providing your data is in part required by law or contract. Without the information necessary for a contract, we cannot provide the respective service.

Changes to this Policy

We update this Privacy Policy when the legal situation or our processing changes. The current version published on our website applies in each case.

Last updated: June 2026 (Version 2.1). This Privacy Policy is reviewed regularly and updated as required.