

# Privacy Policy

## 1. Who we are

This website is operated by:

**HALTO a.s.b.l.**  
Commune d'Useldange  
Luxembourg

RCS Luxembourg: **F15423**

Email: [contact@inclusive-routes.eu](mailto:contact@inclusive-routes.eu)

**Inclusive Routes** is an initiative enabled by **HALTO a.s.b.l.**

HALTO a.s.b.l. is responsible for the processing of personal data in relation to this website.

## 2. What personal data we collect

This website does not currently use a contact form, newsletter registration, online account system or booking system.

If you contact us by email, we may process the personal data you choose to share with us, such as:

- your name, if provided;
- your email address;
- the content of your message;
- any information, experiences, suggestions or documents you voluntarily send to us.

Because Inclusive Routes deals with inclusive travel, accessibility and support needs, messages may sometimes contain sensitive information, for example about disability, health, care needs, family situations or specific support requirements.

Please only share sensitive personal information if it is necessary for your request or contribution.

## 3. Why we process personal data

We may process personal data in order to:

- reply to your message;
- handle questions, suggestions, corrections or requests;
- review resources, links, experiences or information you send us;
- develop and improve the Inclusive Routes project;
- stay in contact with families, organisations, partners or contributors where appropriate;
- ensure the proper and secure operation of the website.

## 4. Legal basis

Where you contact us voluntarily by email, we process your data on the basis of your consent and/or our legitimate interest in responding to your message and managing the Inclusive Routes project.

Where processing is necessary for legal, administrative or organisational reasons, we may process data in order to comply with applicable legal obligations.

Under the GDPR, privacy information should include the identity and contact details of the controller, the purposes of processing, the legal basis, storage periods or criteria, and the rights of the persons concerned.

## **5. Sensitive information**

We treat personal and sensitive information with care and confidentiality.

If you voluntarily share sensitive information with us, we will only use it for the purpose for which you sent it, for example to understand your message, respond to your request or assess whether a resource may be relevant for Inclusive Routes.

We do not publish personal stories, names, photos, diagnoses or identifiable experiences without permission.

## **6. Sharing of personal data**

We do not sell personal data.

We do not share personal data with third parties unless:

- you have clearly asked us or allowed us to do so;
- it is necessary to respond to your request;
- it is required by law;
- it is necessary for the technical operation of the website.

If we would like to publish or share a contribution, experience or testimonial that could identify you or another person, we will ask for permission first.

## **7. Website hosting and technical data**

This website is hosted and technically operated through **Wix**.

When you visit the website, Wix may process technical data necessary for the functioning, security and delivery of the website. This may include, for example, IP address, browser information, device information, pages visited, date and time of access, and similar technical information.

At the moment, Inclusive Routes does not use additional tools such as Google Analytics, Meta Pixel, newsletter tracking, embedded maps or booking systems.

If this changes, this Privacy Policy will be updated.

## **8. Cookies**

At the moment, Inclusive Routes does not intentionally use additional cookies, analytics cookies or marketing cookies.

However, as the website is hosted by Wix, technically necessary cookies or similar technologies may be used by Wix to operate the website securely and properly.

If additional cookies, analytics tools or external services are added in the future, this Privacy Policy will be updated and, where required, appropriate consent options will be provided.

## 9. Data retention

We keep personal data only for as long as necessary for the purpose for which it was provided.

Email messages and related information may be kept for as long as needed to answer the request, follow up on the topic, document the exchange or manage the Inclusive Routes project.

When the data is no longer needed, it will be deleted or anonymised, unless we are required to keep it for legal or administrative reasons. The CNPD explains that, once a retention period is exceeded, the controller must delete or anonymise personal data.

## 10. Your rights

Under the GDPR, you have rights regarding your personal data. Depending on the situation, these may include the right to:

- access your personal data;
- correct inaccurate or incomplete data;
- request deletion of your data;
- restrict processing;
- object to processing;
- withdraw consent where processing is based on consent;
- receive your data in a portable format, where applicable.

The Luxembourg data protection authority, the **CNPD**, explains that individuals can ask whether an organisation holds their personal data and obtain a copy of the data being processed.

To exercise your rights, please contact us at:

**contact@inclusive-routes.eu**

You also have the right to lodge a complaint with the Luxembourg data protection authority:

**Commission nationale pour la protection des données — CNPD**

## 11. Data security

We take reasonable care to protect personal data against unauthorised access, loss, misuse or disclosure.

However, please remember that email communication and internet transmission can never be guaranteed to be completely secure.

## 12. Updates to this Privacy Policy

This Privacy Policy may be updated if the website, services, tools or legal requirements change.

The latest version will always be available on this website.

## Last updated

July 2026