



Privacy and Data Security Policy

LAST UPDATED: 16 June 2018

I place great value on your trust and I am acutely aware of the need to store client data and project documents securely to prevent any accidental loss or unauthorised access. I believe that the measures I take are the most effective ways to safeguard your confidentiality and privacy.

Any personal and/or sensitive information relating to my clients which comes into my possession will be held in compliance with the data protection law, including, as of 25 May 2018, the EU General Data Protection Regulation 2016/679 (GDPR) and the UK Data Protection Act 2018.

WHEN YOU CONTACT ME

When you contact me, I collect basic contact details (name, email address, telephone number and in some cases postal address) so that I can respond to your query and, potentially, work with you on a project. If your enquiry does not lead to us working together, I will keep your information for up to one year from our last contact, after which time it will be securely deleted. I will collect only the information necessary to run my business and manage my working relationship with you, so I can:

- provide you with the information you ask me for
- undertake and deliver translation, editing, proofreading or other language services as agreed with you (i.e. in performance of our contract)
- ask for or provide additional relevant information

- keep you informed about my terms and conditions
- provide you with other important updates about my business that might affect you (for example changes in contact details, my availability or pricing).

In terms of the GDPR, my lawful grounds for collecting, using and storing this data are: a) consent (you have given me this information for these purposes); b) legitimate interest (to run my business, I need to be able to communicate with clients and exchange the information we need to work together or discuss a potential project — and having a record of our communications is essential for accountability); c) (in some cases) performance of a contract (if we agree to work together); and d) (in some cases) legal requirement (if our communications include business records, such as invoices or purchase orders).

I will never sell or swap your data, and I will not pass it to any other organisation or individual unless I am legally required to do so.

I do not currently run a mailing list for marketing purposes, and I will not use your information for marketing purposes without your specific and explicit consent (although my current clients may get some kind of festive greeting from me, either by email or post). If I set up a mailing list in the future, and I am still holding your contact details, I will get in touch to ask for your explicit consent to use your data for this purpose. You will, of course, have the right to modify or withdraw that consent at any time.

WHEN WE WORK TOGETHER

Depending on the circumstances, when you ask me to work on a translation, editing or proofreading project for you I am either the data controller or the data processor. Once the project is complete, I become the data controller of any information I continue to store.

If I work on a project for you, by law I am required to keep your basic contact details (name, address, telephone number and email address) for six years. After this period, if we have had no further contact, this information will be deleted.

If you send me material to be translated, edited, proofread or transcribed, and this material contains your personal data, I will process it (i.e. securely store it and, if relevant, translate it) in

order to carry out the work you have contracted me to do. If the project materials contain personal information belonging to someone else, I will need to be satisfied that you have lawful grounds for passing that information to me under the General Data Protection Regulation (GDPR). I will ask you to confirm this by signing my terms and conditions before I begin work on your documents.

In terms of the GDPR, my lawful grounds for collecting, using and storing this data are: a) performance of a contract; b) legal requirement (by law, I need to keep records of my business activities for six years).

Identifiable personal data will be securely deleted from the project files and from my translation memories (files created by my translation software that help keep terminology etc. consistent) one month after the project invoice has been paid, unless:

- the text is already in the public domain, for example as with references in an academic paper or a blog post; or
- you have asked for a certified translation for official purposes, in which case the full text of the document will be retained for six years so that I can respond to any claims or queries arising in relation to my work. This also comes under the lawful category of 'legitimate interest' under the GDPR.

I take great care to ensure that project files are stored securely (see below). I never outsource my work, so you can rest assured that your documents will not be passed to anyone else.

I never use machine translation services or cloud-based work environments, unless my client asks me to use their own trusted systems.

When it comes to paying your invoice, I accept either bank transfers or PayPal. If you choose to pay through PayPal, please be aware that the data you provide will be processed by PayPal in accordance with its own [privacy policy](#) and data management practices.

KEEPING YOUR DATA SAFE

All of the data you provide is processed by me directly and stored in the UK. Whenever possible, personal data is stored in electronic rather than paper form.

Electronic files are stored in only three places:

1. Tinta Viva's computers, which are usually kept in a private secure office and protected with scrupulously updated anti-virus and malware protection. Files containing personal data (and all documents relating to a translation, editing or proofreading project) are encrypted to AES 256 standard, so even if a computer were to be stolen or lost, nobody would be able to access this data without the password. This password is never shared with anyone else.
2. To protect your data from accidental loss, theft or unauthorised access, all files are backed up 'in real time' using Tresorit. This is a secure, end-to-end encrypted cloud storage service using servers located in the EU. Tresorit is based in Switzerland, which has some of the strictest data security laws in the world. It is a 'zero-knowledge' service — this means that only I can access these files and they are never shared with anyone else.
3. As an additional safeguard, all files are backed up weekly to an external hard disk which is also encrypted to AES 256 standard using a separate password. This device is stored in a secure location at all times.

If I am travelling or working away from the office, I do not use unsecured public wi-fi connections as these are very vulnerable to hacking. Instead, I set up a secure VPN to guard against unauthorised access to the data I am sending or receiving. I do not use mobile internet (e.g. 4G) to contact clients or store or download files.

If personal data must be stored in paper form, it is kept in locked files in a private secure office. I do not carry paper files about with me, so there is minimal chance of loss or theft.

COMMUNICATING WITH YOU

My emails are all stored in encrypted form in secure servers in Switzerland. I keep emails relating to projects I work on for six years (in order to comply with tax laws and in case of any query or claim relating to the work). After this time, they are securely deleted. If you send me an enquiry and you don't ultimately commission work from me, I will keep this information for one year before deleting it. If I contact you to suggest working together, I will keep our correspondence for three years before deleting it. However, you can ask me to delete this information at any time — please see the section entitled 'Your Rights' below.

Under the GDPR, I retain email communication on the lawful grounds of a) legal requirement; and/or b) legitimate interest (a record of recent enquiries helps me communicate with you more effectively in future and stops me sending the same information twice).

Emails cannot be encrypted in transit unless you are using the same email service I do (Protonmail). For this reason, I would strongly recommend that you do not send documents to be translated or edited as unencrypted email attachments. Safer options include:

- encrypting the message using a file archiving tool (like Winzip or 7Zip), then telephoning or texting me to give me the password;
- using a cloud-based file sharing service (preferably an encrypted service; choose carefully, as not all of these services are equally secure and anything you upload will be subject to the provider's data management and privacy policy); or
- using a file transfer protocol (FTP) client.

When we are discussing your project, I will ask you to specify your preferred method for sending and receiving files.

TINTAVIVATRANSLATION.COM

As with almost all websites, when you visit tintavivatranslation.com your IP address and other browser data will be automatically collected and shared with my hosting company, which is based in the UK and fully GDPR compliant. This data may include your MAC address, device manufacturer, model and operating system version, internet service provider, browser type and language, country and time zone and device meta data.

Logging this information is essential for security purposes and for monitoring the general health of my website — collecting it helps protect the site from attack and unauthorised interference and ensures that it is able to function correctly. It is not used for any other purpose and no attempts are made to identify you as an individual through your IP address. This data is held securely on servers located in the UK for a maximum of 35 days.

The website also has a number of measures in place to protect it against malware and other malicious activity. It is protected by a firewall provided by Sucuri, which routes all EU traffic through EU servers. The firewall monitors site traffic and activity on a daily basis and scans it for any security problems. In doing so, it collects some user data which may include IP address, URLs visited, protocol and version, response code, referrer, user agent and whether or not the request was cached by the firewall. Again, this information is not used to identify you individually and will be held for a maximum of 35 days.

Because a combination of security measures provides more comprehensive protection, a security plugin provided by Wordfence is also in place. Wordfence automatically logs your IP address and other information transmitted by your browser for essential security purposes. Again, this may include your device manufacturer, model and operating system version, internet service provider, browser type and language, country and time zone and device meta data. They may also log the pages you visit when you are exploring the website. This information is used only to keep my website safe and is deleted after a maximum of 90 days, provided that your data is not associated with an ongoing attack.

Data collected by security plugins and services may be transferred out of the EEA, including to the USA, subject to the provisions of the Data Processing Agreements in place between myself and these providers. Under these agreements, they are bound to use your data only for the

stated purposes and to implement rigorous measures to keep it secure, providing a level of protection equivalent to that assured in the EU.

Under the GDPR, this data is collected on the grounds of 'legitimate interest'; it keeps my website safe and working properly, which is essential to my ability to run my business and protect visitors to my site.

Cookies are small text files that websites place on your computer or device, and which allow a site and/or its services to recognise you as a unique user. They can then be used to understand how the site is being used and to improve your browsing experience. 'Session cookies' expire and are automatically erased as soon as you close your browser. 'Persistent cookies' remain on your computer or device until they expire or are deleted. Some cookies are classed as 'strictly necessary', which means they are needed for the site to function correctly. 'Strictly necessary' cookies do not collect any personal data and can be placed on your device without your consent. For all other types of cookies, websites are legally required to ask for your prior consent. You can control your general cookie preferences by adjusting your browser settings.

Tintavivatranslation.com currently uses two cookies, both of which are 'session cookies' (they are deleted as soon as you close your browser). The first cookie is called 'DYNSEVER'.

DYNSEVER is a load-balancing cookie. It identifies you as a unique user for access and security purposes and tracks which web server is serving the site at the time. This helps manage traffic demand on my host server and keep the site functioning smoothly. This cookie is 'strictly necessary'; the site cannot function correctly without it. That's why you will not be asked to give consent when you visit Tintavivatranslation.com. It is set by my host server and does not collect any personal data.

The second cookie is called 'euCookie'. This cookie records whether or not you have clicked 'I understand' to dismiss the cookie notice, so it won't show on every page you visit. Again, this cookie is 'strictly necessary' as it is needed in order to comply with the laws governing cookies. It is set by me and does not collect any personal data.

Please bear in mind that if you follow any links from Tintavivatranslation.com to other websites, the data-gathering practices and privacy policies of those sites will apply. You are

advised to check those policies for yourself before accepting cookies from, or providing personal data to, a third-party site.

YOUR RIGHTS

Under the GDPR, you have certain rights as a data subject: the right to be informed, the right of access, the right to rectification, the right to erasure, the right to restrict processing, the right to data portability and the right to object. Not all of these rights are absolute; there are some circumstances in which they do not apply. Detailed information on these rights is available online on the [UK Information Commissioner's Office \(ICO\) website](#).

You have the right to see any data I hold about you at any time. To do this, just get in touch using the contact details below and I will acknowledge receipt of your request within three calendar days. I will provide you with a copy of your data as soon as I can and always within 21 calendar days of your initial request.

If at any point you believe the information I hold on you to be incorrect, you have the right to ask me to amend it. If you would prefer me not to hold any of your data at all, you can ask me to delete it. Please note that this may not always be possible, as sometimes I need to retain your data in order to comply with my own legal obligations or as evidence in the event of legal claims in relation to my work. I will let you know whether amendment or deletion is possible and, if applicable, take the appropriate action within a maximum of 21 calendar days. If I cannot amend or delete your data, I will tell you why.

If you have asked me to delete all of your personal data, I will need to hold on to your name for the sole purpose of keeping a record of the request.

I will not charge you any fee for providing you with a copy of your data, amending your information or deleting it.

If you have any questions or concerns about how I process, store and use your personal data, please contact me, Ruth Grant, by email at info@tintavivatranslation.com or by telephone at +44(0)1367 560 732. If after contacting me you are not satisfied with my response, or if you

believe I am processing your information in a way that is not in accordance with the law, you can contact the UK Information Commissioner's Office (<https://ico.org.uk/>).

Data Controller: Ruth Grant T/A Tinta Viva Translation

Correspondence Address: Tinta Viva Translation, Dunraven House, 32 London Street, Faringdon, Oxfordshire SN7 7AA, United Kingdom

Telephone Number: +44 (0)1367 560 732/ (0)7722 724 755

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