

## **PRIVACY POLICY**

### **3 April 2020**

As a professional freelance translator, I take your right to privacy seriously. This Privacy Policy outlines what, when and why I collect personal data, how I use it, the limited conditions under which I may disclose it to others, and how I keep it secure. As a member of the New Zealand Society of Translators and Interpreters (NZSTI) and the American Translators Association (ATA) I am also bound to maintain client confidentiality. For any questions, you may contact my Privacy Protection Officer; Tom Davidson at [info@apostrophe-translation.com](mailto:info@apostrophe-translation.com)

#### **What data do I collect?**

Personal data collected may include your name, email address, phone number, address, etc. as well as personal information contained in documents you wish to obtain a quote for and/or have translated. Generic information is automatically collected when you visit my website, such as your web browser type, time zone, country, duration of browsing, individual web pages that you view, etc.

#### **How do I collect your data?**

You directly provide most of the data collected. I obtain and process data when you; 1. send an e-mail to enquire about services, 2. send documents for a quote or to be translated, or 3. view my website via browser.

#### **How will I use your data?**

I will not share your personal data with anyone unless required to do so by law. Data obtained when viewing my website is used to improve service delivery. Data is also maintained for record keeping, accounting and statistical purposes.

#### **Why I process your personal data**

I collect, store and use your personal data to issue a quote, provide a translation or editing service that you request, or to comply with legal requirements.

#### **How do I store your data?**

Any data I do keep will be stored in my own private, non-networked computer, which is password protected. Additional storage is via the cloud service provider Dropbox, which is GDPR compliant with the most widely accepted security and privacy standards such as ISO 27001/2 and ISO27018/17.

#### **Security measures**

I take all possible precautionary measures to guarantee that your personal data is safeguarded. The equipment used for storing and processing personal data is updated as frequently as possible. Anti-virus software is installed on the equipment used for storing and processing personal data to prevent the theft or destruction of this information. Anti-virus software is regularly updated. Firewalls are in place on all devices used for storing or processing personal data to avoid remote unlawful third-party access. Personal data is periodically backed up on a device other than that used on a day-to-day basis. The copy is stored in a locked, secure place, separate from the computer containing the original files so that personal data can be recovered in the event of loss or damage. Electronic systems in use for storing or processing personal information are password protected.

#### **Data retention**

Personal data is kept for as long as required for business purposes and may be retained where necessary for compliance with a legal obligation.

#### **How long I keep your personal data?**

In cases of services rendered, I am obliged to retain your personal data for five years to comply with tax obligations, and, if it is embedded in a translation, for up to ten years to preserve the integrity of my personal translation resources.

#### **Third party access**

If I send a text for revision or editing to a colleague, that text will be anonymised so that your personal data will not appear, or the colleague will be asked to sign a confidentiality agreement if necessary. They will be advised of their legal obligations in relation to confidentiality and professional secrecy. Other parties may have access to your personal data for administrative purposes, including my accountant and the providers of my cloud backup and email hosting services. Cloud-based open source tools may be used for translation, but all personal data is removed

## **Marketing**

I do not use your personal data for marketing purposes.

## **Your rights and obligations**

You may contact me at any time to request a copy, rectification or erasure of your personal data. I will take action without undue delay and in any event, within one month of receipt of the request. Please contact me at [info@apostrophe-translation.com](mailto:info@apostrophe-translation.com) if you have any concerns about how I process your personal data.

## **What are your data protection rights?**

I would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

**The right to access:** You have the right to copies of your personal data. We may charge you a small fee for this service.

**The right to rectification:** You have the right to request that I correct any information you believe is inaccurate. You also have the right to request that I complete the information you believe is incomplete.

**The right to erasure:** You have the right to request that I erase your personal data, under certain conditions. Should you ask me to delete translations, I cannot be responsible for queries or claims relating to the content as I will have no way of verifying the accuracy of the original content.

**The right to restrict processing:** You have the right to request that I restrict the processing of your personal data, under certain conditions.

**The right to object to processing:** You have the right to object to how I process your personal data, under certain conditions.

**The right to data portability:** You have the right to request that I transfer the data to another organisation, or directly to you, under certain conditions.

## **What are cookies?**

Cookies are small data files which are placed on your computer (PCs, smart phones or tablets) as you browse. They are used to remember when your computer or device accesses my website, they help it operate effectively and improve your user experience. The data collected includes pages viewed and your journey around the website. These cookies are not used to collect or record data on your name, address or other identifying details.

## **What types of cookies do we use?**

My website uses a minimal build of Google Analytics, a service which transmits website traffic data to Google servers in the United States and allows me to notice trends to improve the user experience on my website. This minimal build processes personal data such as: my unique Site ID set by Google Analytics, the date and time, the title of the page being viewed, the URL of the page being viewed, the URL of the page that was viewed prior to the current page, the screen resolution, the time in local time zone, the files that were clicked on and downloaded, the links clicked on to an outside domain, the type of device, and the country, region, and city. Google LLC has certified their compliance with the EU-U.S. Privacy Shield framework and on that basis, they provide a guarantee of compliance with European data protection law. The data sent and linked to the Google Analytics cookies will be automatically deleted after 50 months. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

## **How to manage your cookies**

You may opt out of this tracking at any time by activating the "Do Not Track" setting in your browser.

## **Privacy policies of other websites**

My website contains links to other 3<sup>rd</sup> party websites. This privacy policy applies only to my website. If you click on a link to another website, you should read their privacy policy.

## **Changes to my privacy policy**

My privacy policy is under regular review and I place any updates in this policy document. This privacy policy was last updated as stated at the top of page 1.

## **How to contact me**

If you have any questions about my privacy policy, the data I hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact me at [info@apostrophe-translation.com](mailto:info@apostrophe-translation.com).