

Privacy Notice for Language Service Providers

Last updated on 9th March 2021

This **Privacy Notice** applies to Textual Relations AB's ("we" or "us") practices regarding the collection, use and disclosure of your personal data when you provide language-related services to us or when we find and recruit new partners for language services. This Privacy Notice applies especially when you collaborate with us in the capacity of a freelance linguist, such as a freelance translator, reviewer, editor, terminologist, computational linguist, localisation engineer, etc. as well as a freelance project manager or coordinator.

We may update this Privacy Notice from time to time, e.g. due to changes in our operations or the legal obligations that apply to us. All updates will be made available here. We recommend that you review this Privacy Notice periodically.

1. Who are we?

We are Textual Relations AB, a company established in Sweden with a registered address in Violettgången 4, 42165 Västra Frölunda, Sweden. For all privacy-related questions, you can contact us at info@textual.ai.

2. What data do we collect and why do we collect it?

We may collect and process various types of personal data depending on our business relationship with you. Different data is needed for different purposes, e.g. depending on the nature of your assignments, on whether or not you have received a payment from us, based on the translation software that is used, etc. Article 6 of GDPR defines the lawful basis for the collection and processing of personal data. In the table below you can find the Lawful Basis for each Purpose together with examples of the personal data that we might collect and process.

Purpose	Examples of personal data	Lawful basis
We process certain information from public sources to find and recruit new translators for our assignments	Information available on your public profile such as your name, email address, phone number, educational background, certifications, language pair	Legitimate interests
We need certain information to enter into an agreement with you and fulfil our contractual obligations to you	Information such as your name, phone number, email address, rates, links to your public profile, information about CAT-tool you use, payment details	Contractual necessity

Enabling workflow of assignments and collaborating with other translators	Information such as your name, email address, username, language pair, availability, time zone and country of residence, CAT-tool information and log data	Contractual necessity
We need to have your contact details in order to respond to your inquiries and communicate with you	Information such as your name, email address, username and profile picture	Contractual necessity
We need your personal data to provide you with access to our platform, other applications and client materials	Information such as your name, email address, usernames, passwords	Contractual necessity
We use personal data to calculate your commissions and process your payments	Information such as your personal or company numbers, VAT number, bank details, payment methods	Contractual necessity
We use certain personal data to do quality assurance regarding your past assignments	Information such as the name of the past assignments you worked on, CAT-tool information and log details	Our legitimate interests
We process certain personal data to maintain, analyze and improve our information security	Information such as login details, IP-addresses, timestamps	Our legitimate interests
We need certain personal data to comply with legal obligations. We are subject to such obligations as per current bookkeeping requirements.	Information such as name, address, phone number, email address, bank and payment details, transaction details, currency	Legal obligation

3. How do we collect your information?

Depending on your relationship with us, we may collect your personal data from the following sources:

- (i) Directly from you when you submit it to us (e.g., when you apply to an open position or send us enquiries)
- (ii) Directly from you by automated means when you use our platform or other applications (e.g. when you use our platform, we automatically collect your IP-address and other log data)
- (iii) From public sources such as social media or relevant websites (e.g., when we are searching for new translators, we might find your contact details on different websites).

4. How long do we retain your personal data?

We will keep your personal data for no longer than reasonably necessary for our ongoing business relationship and agreements, for our internal record keeping or regulatory purposes, and in case of any legal claims or complaints. We have set different retention periods for different categories of personal data and they can be found in the table below:

Category	Retention period
Job application data	<p>Due to an extremely high number of applications, we receive we are unfortunately unable to answer all of them. Unanswered applications for published job posts as well as unsolicited applications are stored for one year (1) after the end of the screening process for each job post i.e. after the receipt of an unsolicited application.</p> <p>If we have been in touch with you regarding a certain position, we will store your application for three years (3). In this case, apart from job application data, we will also store the correspondence, e.g. emails and messages on other websites, such as LinkedIn, Facebook, proz.com, thehub.se, and similar.</p>
Payment related data	All payment related data is retained for seven (7) years for accounting purposes.
Login credentials	your login credentials for our platform or other software is retained for as long as you have an agreement with us.
Assignment information	All assignment-related information will be retained for five (5) years after the relevant client agreement has expired or has been terminated, even if your agreement with us has ended.

5. Do we disclose your personal data to third parties?

As we cannot do absolutely everything on our own, we use partners and service providers that provide certain data processing operations for us. Below you will find a list of categories of third parties that we use to conduct our business:

Category	Examples
Hosting providers	We use hosting providers such as Amazon and Google to provide the infrastructure to host the applications and data related to our services.
Software and application providers	We rely on certain 3rd party applications and software in our business operations, such as Microsoft or Google for email, SDL Trados for translation tools and management.
Accounting and payment providers	To comply with accounting requirements and process your payments, we disclose your personal data to our accounting partners and banks.
Other partners and clients	Your personal data will be shared with other partners of Textual Relations AB to enable efficient collaboration. This is especially relevant for those assignments that are conducted in a shared, digital environment, e.g. Google Docs, SDL Online Editor, Slack, etc., and those where more than one partner is needed to fulfil the task, e.g. translation and proofreading. Furthermore, your personal data can be shared with our clients as well as other partners such as project managers and coordinators, computational linguists, or members of the DevOps-team (IT and engineering partners).

6. Do we transfer your personal data outside the EU?

As We, our service providers and our partners also operate internationally, your personal data can be transferred to countries outside the European Economic Area (“EEA”). For every such transfer, we will take measures to make sure that there are adequate safeguards in place to protect your personal data when it is being transferred outside EEA. This includes signing so-called standard contractual clauses approved by the EU Commission with the recipients or that our US-based partner is certified under the Privacy Shield to protect your personal data.

Examples of countries where we might transfer your personal data		
The country where we might transfer your personal data	Why do we need to transfer your personal data?	On what grounds do we transfer your personal data?
United States	Sometimes we need to transfer your personal data to the US because some of our service providers are located in the US.	EU-US Privacy Shield
India	In some cases, we use 3rd parties for IT-system maintenance. These maintenance providers are located in India and therefore some of your personal data might be accessed from India.	EU Commission’s standard contractual clauses
Australia	During some of your assignments, you might need to collaborate with Our partners who are located in Australia, which means that they will have access to some of your personal data.	The transfer is necessary for the performance of a contract between you and us.
Japan	During some of your assignments, you might need to collaborate with Our partners who are located in Japan, which means that they will have access to some of your personal data.	The European Commission has recognised that Japan provides an adequate level of data protection.

7. Your rights as a data subject?

The data protection laws grant you certain rights regarding the use of your personal data. If you believe we have violated your rights as a data subject, you can, at any time, lodge a complaint to a data protection supervisory authority. you can find the contact details of The Swedish Authority for Privacy Protection - Integritetsskyddsmyndigheten (IMY) here: www.imy.se. We have listed other rights you have regarding your personal data below. If you wish to exercise any of these rights, please contact us at info@textual.ai.

Right of access:

You have the right to request at any time, a confirmation whether we are processing your personal data or not. In case we are processing your personal data, you have the right to access and receive a copy of such information.

Right to correct your information:

If you believe that the information we store on you is incorrect or out-of-date, you may contact us and request to correct such information.

Right to be forgotten:

You have the right to request us to delete your personal data and we will do so, except if we have a legal obligation to store it or when we have legitimate reasons to retain it. For example, we need certain information to verify a business transaction or to defend or to prepare for a legal claim.

Right to restrict processing:

You have the right to ask us to suspend processing your personal data, for example, if you need such information for the establishment, exercise or defence of legal claims and you do not want us to delete such information in accordance with our retention times.

Right to transfer your information:

You have the right to get the personal data you have provided us with in a commonly used, machine-readable format so that you can transfer your information to another company.

Right to object processing:

You have the right to object to the processing of your information, and we will cease all processing except when we believe we have legitimate reasons to continue processing. At any time, you may object to any processing that we might do for direct marketing purposes.