Tara F. Chace LLC Privacy Policy

Last updated: May 25, 2018

My obligation as a professional translator and *processor* of your personal information is to keep your personal information safe when you as *controller* use my translating, editing, and other services. I collect information about my clients who have me perform those services for them, and I collect information about the people who contact me for quotes and information about potential projects.

In compliance with the General Data Protection Regulation (EU), this Privacy Policy (hereinafter "the Policy") explains:

- Who I am and therefore who is collecting your personal information
- What personal information is being collected
- The legal basis upon which I collect personal information
- When personal information will be collected
- Use of translation memory (TM)
- Security of Personal Information
- Why I collect your personal information
- How I use your personal information
- How long I will keep your personal information
- Sharing your personal information
- . The rights of Data Subjects

Any questions relating to the Policy or to request a copy of the data I hold please contact me at tfcllcqdpr(a)outlook.com.

Who I am

As a self-employed translator, I operate as a limited liability corporation under the laws of the state of Washington in the United States called Tara F. Chace LLC. Your business relationship with me is with my LLC and not me personally, even if I use words like "I," "me," or "my" to refer to my company. My name is Tara Chace, a translator based in the United States. I translate from Norwegian, Swedish, and Danish into English. I work full-time as a translator, and I translate only into my native language, which is English.

Services Provided

Translation, translation editing, copy editing, proofreading, transcreation, localization, subtitling, transcription, review, and linguistic testing

What type of information is collected from you

The personal information I may collect includes:

- Your name
- Telephone number
- Address
- E-mail address
- Website address
- Source Materials/documents
- Business/company name and tax ID number
- · Your comments or requests regarding the services you want me to provide
- Banking or payment information

Note that there are certain legal obligations incumbent on you as the *controller* of any information in materials that you choose to share with me. When you provide me that source material, you must first have the right and authorization to share that information with me, and otherwise you should redact all personal information before you share it with me.

The legal basis upon which I collect personal information

I process your data to provide you relevant services as specified above under "Services Provided" and to provide you follow-up customer service; whenever it is in my legitimate interest to do so if these interests do not override your rights or I have consent to do so; or whenever I am compelled by law to collect this information.

When personal information will be collected

I obtain information about you only when you or someone who represents you contacts me by e-mail, text message, postal mail, or other methods to ask me for a quote, information, or collaboration.

Use of translation memory (TM)

To keep the coherence and consistency of the translation, and to facilitate my work, I sometimes extract and compile translation memory from clients' source material using CAT tools (computer-assisted translation tools). The TM base will be kept indefinitely.

Any personal data, when entered into the TM base, will be anonymized and effectively scrambled into segments, thus the data subject cannot be identified. The TM base is used offline and its use restricted and protected by passwords and encryption. I will not share the TM base with any third party unless I am compelled by a court order to share it.

Security of personal information

All information that I hold concerning you will be held and processed strictly in accordance with the provisions of the General Data Protection Regulation ("GDPR"). Your personal information will be securely stored in my database for no longer than is necessary with respect to the reasons for which it was first collected. I protect the privacy of your information by storing it on an encrypted disk secured by passwords, by using secure third-party servers protected by strong passwords and two-factor authentication, and by using a cloud back-up service in case of equipment failure that uses AES-256 encryption and that is secured with strong passwords, two-factor authentication, and a private key.

My working computers, internet access, and all e-mail are protected by a regularly updated antivirus, antiphishing, and antimalware software to prevent any malicious attempts. I generally use e-mail services that use secure connections (https), but I can additionally use an encrypted e-mail service to communicate with you securely and exchange files in an encrypted way if you ask me to.

Why I collect your information

Your information is used to communicate and collaborate with you with regard to the services I provide. I will also use your information to provide follow-up customer service and to receive payment from you.

How I will use your personal information

I may use your information to:

- . Communicate with you about services, quotes, questions, complaints, and other activities
- · Provide services you have requested
- · Seek your views, comments, or feedback on my services
- Notify you of changes to my services, terms, and policies
- Bill you for services I have done for you and notify you about your payment status
- Collect payments from you
- Notify or remind you of services that I offer
- File income or business taxes or issue tax-related statements, forms, or documentation as required by law

How long I keep your information

I will hold your personal information in my records for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract I have signed with you. I review my retention of personal information on an annual basis. Generally, the source materials or documents that you have given me so that I can perform my services for you are retained in case you or I need those materials for follow-up customer service or to make changes requested by the customer in the future. This period of time will vary depending on the contract you and I have signed. If you ask me to, however, your information will be automatically erased upon confirmation of completion of the services and fulfillment payment except unless I am required by law to retain any of it.

Sharing your personal information

If my LLC ever has employees, my employees may have access to your information, but they will be contractually subject to all the same strict confidentiality, nondisclosure, privacy, and security rules. I do not sell your personal information. I do not share your personal information with third parties with four exceptions: If I make use of professional business services such as a certified public accountant ("CPA"), bookkeeper, or attorney who help me comply with legal and tax obligations or to collect unpaid invoices, I may share your information with them but only to the extent necessary for them to perform their professional services for me. If I make use of an editor for quality control services, I may share your information with that party, but only to the extent that the actual document being reviewed may contain this information. I always have a confidentiality and privacy agreement in place with such providers before I use them, so they will keep your information at least as private and secure as I do.

The rights of the data subject

The GDPR provides the following rights for individuals:

- 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
- The right to object

The right to be informed about my collection and usage of your data

This is covered in this privacy policy.

The right of access (right to request the data I hold)

The General Data Protection Regulation ("GDPR") grants you the right to a copy of any data concerning you that has been processed. I will respond in a timely manner within the one-month time frame laid down by the GDPR from the point of receiving the request and all the necessary information from you. The request is free of charge.

The right to rectification

You are entitled to have personal data rectified if it is inaccurate or incomplete. I will respond to requests for rectification within one month of receipt of the request.

The accuracy of your information is crucial for me to provide my services. If you change your e-mail address, or if any of the other information I hold is inaccurate or out of date, please contact me.

The right to erasure (also known as the right to be forgotten)

You have a right to have your personal data erased and to prevent processing in specific circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed
- If you withdraw your consent to processing
- If you object to the processing, and there is no overriding legitimate interest for us to continue the processing
- Your personal data was unlawfully processed (i.e., otherwise in breach of the GDPR)
- Your personal data has to be erased in order to comply with a legal obligation
- The right to restrict (i.e., prevent) further processing of your data

The right to data portability

This right allows you to move, copy, or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

The right to object

You have the right to object to:

- Processing based on legitimate interests or the performance of a task in the public interest/exercise of
 official authority (including profiling); and
- Direct marketing (including profiling);

Please note that most of the personal information I collect from you is crucial for the performance of a task or service. Should you object the processing of your data. I may not be able to provide the service you have required.

Invoking your rights

If you would like to invoke any of the rights mentioned above or if you have any questions or concerns regarding this policy, please contact me by e-mail at tfcllcgdpr(a)outlook.com.

Review of the Policy

This Policy is under regular review.

This Policy was last updated on May 25, 2018.