

## **PRIVACY POLICY OF TEXTEXPERT TRANSLATIONS OÜ**

TextExpert Translations OÜ (hereinafter also referred to as “TextExpert” or “we”) complies with the requirements and principles set out in this Privacy Policy. TextExpert respects individuals’ privacy and is committed to protecting their personal data. This Privacy Policy sets out the purposes, terms and conditions of personal data processing and the rights of data subjects in relation to their personal data. TextExpert considers the confidentiality and protection of personal data to be of the utmost importance and ensures that personal data is processed lawfully.

### **1. Terms and definitions**

|                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Client</b>                      | A recipient of TextExpert’s services, who may be a natural or legal person.                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Controller</b>                  | The natural or legal person or public or local government authority that originally collects personal data. The controller determines the purposes and means of the processing of personal data.                                                                                                                                                                                                                                                          |
| <b>Data subject</b>                | The person whose personal data are processed.                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Personal data</b>               | Any information relating to an identified or identifiable natural person (data subject). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. |
| <b>Personal data breach</b>        | A breach of security leading to the accidental or unlawful destruction, loss, alteration or unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.                                                                                                                                                                                                                                                             |
| <b>Processing of personal data</b> | Any operation or set of operations that is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure (by transmission, dissemination or otherwise), alignment, combination, restriction, erasure or destruction.                                                                     |
| <b>Processor</b>                   | The natural or legal person or public or local government authority that processes personal data on behalf of and as instructed by the controller.                                                                                                                                                                                                                                                                                                        |
| <b>Third party</b>                 | A natural or legal person, public or local government authority, agency or body.                                                                                                                                                                                                                                                                                                                                                                          |

## **2. Scope of the Privacy Policy**

This Privacy Policy applies when you:

- a) use the TextExpert website ([www.textexpert.ee](http://www.textexpert.ee));
- b) order services from TextExpert;
- c) contact TextExpert using the enquiry form on the website or via e-mail or any other electronic means of communication.

## **3. Controller and processor of personal data**

Depending on our relationship with the data subject and how the personal data are received, we may process personal data as either the controller or the processor.

As the controller, we process data about our clients, who may be natural or legal persons. We also process data about individuals who contact us by email, via our website contact form or in another manner.

### **The processor**

As the processor, we process personal data that come to our attention in the course of providing a language service. The controller of such personal data is the client who ordered the respective service from us. As the processor, we adhere to the written instructions of the controller when processing personal data.

### **The controller of personal data**

TextExpert Translations OÜ

Narva mnt 5, 10151 Tallinn, Estonia

e-mail: [andres@textexpert.ee](mailto:andres@textexpert.ee)

## **4. Principles**

**4.1** TextExpert observes the following principles when processing personal data:

**4.1.1** The principle of fairness, lawfulness and transparency: processing must be fair, lawful and transparent to the data subject;

**4.1.2** The principle of integrity and confidentiality: personal data are processed in a manner that ensures appropriate security of the data, including protection against unauthorised or unlawful processing and accidental loss, destruction or damage through the use of appropriate technical or organisational measures;

**4.1.3** The principle of accuracy: personal data must be accurate and, where necessary, kept up to date, and all reasonable steps must be taken to ensure that personal data which are inaccurate, with regard to the purposes for which they are being processed, are erased or rectified without delay;

**4.1.4** The principle of storage limitation: personal data are retained in a form which enables the identification of data subjects only for as long as this is necessary for the purposes for which the personal data are processed;

**4.1.5** The principle of purpose limitation: personal data are collected for clear, specific and legitimate purposes and are not further processed in a manner that is incompatible with those purposes;

**4.1.6** The principle of data minimisation: personal data must be adequate, relevant and limited to what is necessary for the purposes for which they are being processed.

## **5. Personal data processed, purposes and legal basis**

TextExpert always processes personal data to the minimum extent possible, and only for the purposes and on the legal basis described below. Only persons authorised by TextExpert who require access to personal data have such access.

### **5.1 Provision of services**

A contract is entered into between TextExpert and the client for the provision of a service. For the purposes of entering into the contract and exercising the rights and fulfilling the obligations arising therefrom, we process the following personal data pertaining to the client or their representative:

- a) Given name and surname;
- b) Contact details (telephone number, e-mail address and postal address);
- c) Data required for invoicing;
- d) Information provided to us by the client on their own initiative prior to or in the course of the contract (e.g. the content of email correspondence and files attached to emails or website enquiry forms).

Such personal data must be processed to facilitate entry into the contract between TextExpert and the client and to exercise the rights and fulfil the obligations arising therefrom.

In the course of fulfilling contracts entered into with a client, personal data contained in text or other content provided by the client are also processed. Such data may include:

- a) the given name and surname of a third party;
- b) the email address, telephone number and postal address of a third party;
- c) other data, depending on the content and requirements of the work.

Such data processing is carried out on behalf of and as instructed by the client as the controller of the personal data and is strictly limited in scope. This means that access to third-party data provided by the client is limited to those employees who require it in order to fulfil the client's order. In this context, TextExpert is the processor of the personal data provided by the client.

## **5.2 Fulfilment of obligations arising from legislation**

In certain cases, we are required to process personal data in order to comply with legal obligations. First and foremost, this includes accounting obligations (reporting and document retention), but also responding to enquiries from authorities.

In such situations, the legal basis for processing personal data is the legal obligation that we are required to fulfil.

## **5.3 Responding to enquiries**

A client can contact TextExpert with questions about a service via the enquiry form or chat window on the website or by sending an email.

We process the following personal data when we receive and respond to enquiries:

- a) Given name and surname;
- b) Contact details (telephone number, email address and postal address);
- c) Information provided to us by the individual on their own initiative (e.g. email content and information or files attached to emails or website enquiry forms).

The basis for processing such data is a legitimate interest.

## **6. Security of personal data processing**

**6.1** Following the principle of reasonableness, TextExpert implements organisational, physical and information security measures in order to protect personal data.

**6.2** In certain cases, TextExpert may use processors to process personal data and provide services. TextExpert ensures that processors process personal data as instructed by TextExpert, in accordance with applicable law and by implementing relevant security measures. Confidentiality agreements are entered into with all processors.

**6.3** TextExpert immediately notifies data subjects of any personal data breaches.

## **7. Third parties and authorised persons**

**7.1** Where strictly necessary, TextExpert may transmit personal data to third parties and authorised persons in accordance with the following principles:

**7.1.1** Personal data are transmitted solely for the performance of the agreed work (i.e. for the provision of the service);

**7.1.2** TextExpert confirms that it only transmits personal data to third parties and processors who implement adequate security measures to ensure the protection of personal data.

## **8. Processing of personal data of minors**

TextExpert understands that ensuring security in the processing of the personal data of minors is very important. Therefore, we implement all relevant administrative and technological security measures in this regard. As the processor, TextExpert only processes the personal data of minors for the provision of a service if the document required for that service includes such personal data.

## **9. Rights of data subjects**

Data subjects have the right to:

- 9.1** make enquiries regarding the personal data they have submitted to TextExpert;
- 9.2** restrict the processing of their personal data;
- 9.3** lodge a complaint about the processing of personal data with the data protection inspectorate;
- 9.4** have their personal data erased.

## **10. Storage of personal data**

**10.1** TextExpert only retains personal data for as long as is necessary for the fulfilment of a contract or as justified by the purposes of processing personal data, after which the data are erased and/or destroyed. The retention period for personal data depends on the data type. The same personal data may be stored for different purposes. For example, some personal data may be retained because of legal requirements, even if they are erased or destroyed for other purposes.

**10.2** In general, TextExpert retains personal data for the duration of a contractual relationship and for one year after the contract comes to an end, unless otherwise agreed between the recipient of the service and TextExpert.

**10.3** In order to fulfil legal obligations (e.g. taxation and accounting legislation), personal data are retained for the period required by law (e.g. accounting-related data are retained for seven years + the current year). In this case, personal data are only used for the fulfilment of relevant obligations.

**10.4** TextExpert securely erases and/or destroys any personal data for which there is no longer a purpose for retention.

## **11. Amendments to Privacy Policy**

TextExpert values the privacy of individuals. Therefore, we update this Privacy Policy on a regular basis. The latest version of the Privacy Policy is always published on the website.

## **12. Use of cookies**

**12.1** The website managed by TextExpert ([www.textexpert.ee](http://www.textexpert.ee)) may use cookies in order to make using the website smoother and more convenient.

**12.2** A cookie is a small text file which is automatically saved by the web browser on the device being used by the individual. We use cookies to:

- a) collect generalised statistics regarding the use of the website (e.g. the number of visitors and patterns of use);
- b) improve the user experience and ensure the functionality of the website.

**12.3** Users can restrict the saving of cookies and block or delete cookies via their browser settings. The website may not work properly and not all services may be available if cookies are not allowed.

## **13. Contact details**

If you have any questions, concerns or proposals regarding the processing of personal data, you can contact the controller using the following details:

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TextExpert Translations OÜ  
Narva mnt 5, Tallinn, Estonia  
e-mail: [andres@textexpert.ee](mailto:andres@textexpert.ee)