

# PRIVACY POLICY | Regulation (EU) 2016/679

Linguarama - Serviços Linguísticos, Unipessoal, Lda, hereinafter LINGUAEMUNDI, has always striven to respect the privacy of the data subjects and holders of the data that it processes and may process in the various aspects of its business activity, and hereby undertakes to protect and guarantee the security of all personal data.

Under the above regulation, and other legislation in force, data subjects are informed of how their data are collected, processed and protected.

We have sought to draw up this policy in a manner that is transparent, clear and simple, so that it can be easily understood, and we therefore ask data subjects to read it to help them decide <u>freely and voluntarily</u> if they wish to provide LINGUAEMUNDI with their personal data.

In doing so, the data subject assures that they are of legal age (or their legal representative, in the case of school age students), that the data disclosed are true, accurate, complete and current, and that they are liable for any direct or indirect damage or loss that may arise as a consequence of the breach of such obligation.

If the data subject is a third party, make sure that they have been notified of the conditions set out in this document and that you have obtained their permission to provide their data to LINGUAEMUNDI for the purposes indicated.

#### I - Scope and Responsibility

This privacy policy applies to all personal data collected by LINGUAEMUNDI.

How do we collect your data?

O Documentation received for translation and other language services, which may contain personal data;

• Data requested to fill in the registration form for external suppliers (vendors or translators, revisers and providers of linguistic services and other related services) available at <a href="https://www.linguaemundi.pt">www.linguaemundi.pt</a> and in the relevant platform <a href="https://dm.linguaemundi.pt/public/loginven.php">https://dm.linguaemundi.pt</a> public/loginven.php</a> hereinafter DOCMASTER®;

O CVs received to apply for a vacancy in LINGUAEMUNDI, or to offer translation / linguistic services, as our external supplier;



• Documentation received, such as certificates of academic training, information regarding any training received in the course of their professional development, and other documentation required / provided in the context of the supplier compliance process for the certification and respective audits of LINGUAEMUNDI under NP EN ISO 9001: 2015 and NP EN ISO 17100: 2016 standards;

• Data requested to complete the registration form for individual customers for quotation, project management and billing purposes;

• Data requested for enrolling students in our school and the relevant data of individual clients for the purposes of enrolment and organization of the groups / courses and respective billing;

• Data provided to LINGUAEMUNDI by internal workers for the due purposes established by the legislation on the employment relationship.

# What body is responsible for processing your personal data (the controller)?

**Linguarama - Serviços Linguísticos, Unipessoal, LDA**, whose trade name is **LINGUAEMUNDI**, is the body responsible for processing the data or the controller.

LINGUAEMUNDI can be contacted on any question related to this privacy policy, by the following means:

- Email address: quality-dataprot@linguaemundi.pt cc: office@linguaemundi.pt
- Postal address: Av. Antão de Carvalho, nº 9, 5000-224 Peso da Régua
- Telephone: +351 254 322 525



## II- Purposes of the processing and legal basis

# On what basis can we process your personal data?

#### CONSENT

Express - in writing or by clear validation of an option, provided it is given in advance, freely, and it is informed, specific and unequivocal

#### FULFILMENT OF LEGAL REQUIREMENTS

Processing of personal data that include all proceedings regarding the processing of salaries, billing, HR, sick leave, garnishments, social security and taxes, and others

#### CONSENT WITH RESPECT TO MINORS

Besides agreements for the provision of educational services, when it comes to processing the personal data of minors which might be subject to prior consent, we will always ask for consent from parents/guardians, on behalf of the owners of said data

#### EXECUTION OF CONTRACT AND PRE-CONTRACTUAL PROCEEDINGS

Processing required for the conclusion, execution and management of the contract/provision-procurement of services

#### LEGITIMATE/VITAL INTEREST

When processing is done in the context of a legitimate interest, such to improve service and quality control, and to protect a vital interest



# For what purpose do we process your personal data?

The data subject is informed that personal data collected through the means described above will be processed by LINGUAEMUNDI to: respond to their requests; perform contracted language or educational services; control the quality of the language and other services provided, including the selection of suitable staff; process the fees and invoices and all the proceedings inherent in the performance of contracts, including compliance with the legal requirements and obligations applicable to the employment relationship.

We also conduct satisfaction surveys with a view to continuous improvement. Further details on the purposes are provided to the data subject when the data are gathered, or, in the case of regularization of data already held, when a particular situation is being reviewed.

LINGUAEMUNDI undertakes to process data solely for the purposes described, unless otherwise expressly authorized by the data subject.

Such processing will always be carried out in compliance with the applicable law and provided that there are no legitimate interests involved that in any way affect the fundamental rights and freedoms of the data subject.

## III - Communication of data

# To whom do we communicate your personal data?

Users are informed that their personal data may be communicated to:

LINGUAEMUNDI's accountant.
The people responsible for IT services, those looking after other software matters and managing our website and DOCMASTER®.
To the auditors of the certification body in the context of the certification process and audits under the standards NP EN ISO 9001: 2015 and NP EN ISO 17100: 2016.
The insurance company.
The authority and provider responsible for occupational health.
Government agencies such as the social security institute and the tax authority.
Language services professionals, solely in the case of data contained in documents for translation/revision/interpretation.

## IV- International data transfers

For the **generality of the data it collects**, LINGUAEMUNDI will process the data of the data subject **entirely within the territory of the European Economic Area**, and therefore no international transfer of data is envisaged, **except in the case** of any personal data contained in documents that Our clients **send to us for the purposes of language services** and that involves languages that so require, **with us being data Processors**. In this case, processing might



require the transfer of such data outside Portugal. LINGUAEMUNDI undertakes to confirm in advance that the linguist, the country or territory to which it transfers the data ensures an appropriate level of data protection or has been the subject of a decision on adequacy by the European Union.

## V- Retention period

# How long do we keep your personal data for?

The data collected will only be kept for as long as it takes to achieve the specified objective, or until data subjects exercise their right of opposition or right to be forgotten, or until they withdraw their consent.

With regard to financial and accounting data, for a period of 10 years from the closing of the processes and activities to which they relate.

In the case of CVs and information submitted by applicants for job opportunities and offers of spontaneous services performed by the data subjects, for a period of one year.

With regard to the foregoing, without prejudice to the fact that LINGUAEMUNDI may retain them beyond this period in order to comply with any legal obligations.

## VI- Rights of data subjects

# What are their rights in terms of data protection and how can they exercise them?

Data subjects can, at any time, exercise their rights of **access**, **rectification**, **erasure**, **objection**, **restriction** and **portability** of their data, either directly on the DOCMASTER® platform if they are external suppliers, or by contacting the personal data protection coordinator by email, as provided for in current legislation, i.e. except in cases where this cannot be done for reasons of compliance with legal requirements.

Data subjects can also withdraw their consent at any time, in which case we will only keep such information that we may be required to retain for reasons of compliance with legal requirements

In any case, data subjects are informed that if they feel that LINGUAEMUNDI has violated their rights under the applicable data protection law, they can submit a complaint to the relevant oversight authority, https://www.cnpd.pt/.

#### VII - Mandatory nature of the requested data

The data that are marked with an asterisk (\*), or otherwise indicated, in the forms provided by LINGUAEMUNDI must be completed for your relationship with LINGUAEMUNDI to be established and function, whether as customer, supplier, student, worker or applicant.



This means that if data subjects do not provide them, LINGUAEMUNDI may not be able to deal with their request, or to continue the relationship.

#### VIII- Automated decisions

LINGUAEMUNDI does not enforce automated decisions based on the processing of the personal data of the data subjects.

#### IX- Measures for the protection of personal data

LINGUAEMUNDI undertakes to protect the security of all personal data that is entrusted to us. We have therefore adopted a number of technical and organizational security measures to protect all personal data that are provided against their disclosure, loss, misuse, alteration, processing and unauthorized accessing, and against any other form of unlawful interference. In addition, measures have been taken to safeguard information through backup procedures.

## How do we protect all this personal data?

Notwithstanding the security measures implemented, as Internet users, visitors to the website and our DOCMASTER® Platform, as well as email senders, should always take extra security measures. These include ensuring that they use PCs and Browsers that are up-to-date in terms of properly configured security patches, and that are installed with an active firewall, anti-malware software (anti-virus and anti-spyware). Furthermore, they should ensure the authenticity of the Internet sites they visit and avoid websites that they do not trust.

#### X- Cookies

The application /sending CV form and its user page on the DOCMASTER ® platform uses cookies.

## What kind of cookies do we use?

We use session cookies to validate and authenticate users.

#### \* If asked to do so, please send a signed copy

Signature, and name in capital letters

I have duly taken note,\_\_\_\_\_

Date:\_\_\_/\_\_/\_\_\_