

# Comprendo AS – Privacy Policy

## Introduction

As a general principle, all personal, technical and commercial data that Comprendo (“we”) receive from our clients and others are handled in the strictest confidence. We are fully aware of the importance of protecting and correctly handling your personal data, and we comply with all data protection and privacy laws. This includes the General Data Protection Regulation (GDPR, for the EU and EEA areas), which came into force on 25 May 2018, and all relevant Norwegian laws.

This Privacy Policy explains how we protect and handle your personal data, and was last updated on 22 January 2018.

## Personal Data

Personal data are defined as information related directly or indirectly to an identified or identifiable living person. For our purposes, as a language service provider, such data fall mostly into one of two categories.

1. Contact and administrative information such as names, national insurance/identity numbers, phone numbers, postal and e-mail addresses, as well as IP addresses, cookies and other online identifiers. We receive such data from our clients in connection with requests for information or quotes and orders for services, and use them in correspondence during assignments and in connection with invoicing procedures etc. We also administer such data from our subcontractors (freelance translators/interpreters) and other suppliers.
2. Personal data contained in documents that we receive from our clients in connection with translation or interpreting assignments. Sometimes these documents may contain sensitive personal data that may be adapted or converted (processed) during the translation process.

The data we receive may be in the form of paper copies or computer files contained in e-mails or letters. Data will be stored, administered and processed using our IT servers (located in Norway), office computers, laptop PCs and mobile phones. If we receive a document in a language that is unfamiliar to our project managers, it will be treated as if it contained personal data.

Under the GDPR, we act primarily as a “Data Processor” for data in categories 1 and 2, which means that we process your data in order to fulfil our obligations to you as a service provider. As a client, you will normally be defined as a “Data Controller” because you determine the purpose and means of data processing by choosing us to carry out your translation assignments. As a Data Controller, you are responsible for satisfying yourself that Comprendo is GDPR-compliant, and for ensuring that you have a legitimate reason and/or the consent of the owner to send us personal data for processing. This is especially important in situations involving sensitive personal data.

If we outsource your translation to a freelance translator, he or she is defined as a “Sub-Processor”. In such situations, we become both a Data Processor and a Data Controller, and thus become responsible for ensuring that your personal data are handled in compliance with relevant legislation. We achieve this using subcontractor agreements that we enter into with all our freelance translators and interpreters.

## Why do we retain and process your personal data?

We may only retain and process your personal data for specific and legitimate purposes, and will only retain and process the minimum amount of data that is necessary to fulfil these purposes. In some

cases, we may be obliged to retain your personal data by law, or to meet the requirements of the regulatory/supervisory authorities, such as for tax or auditing purposes, for a defined statutory period.

However, the main reason for retaining and processing your personal data is to ensure that we have sufficient information to provide you with a high-quality service from the date on which you request an assignment until we receive payment of the invoice. We may continue to retain your personal data in order to facilitate correspondence until our client relationship with you is concluded.

In all cases, we may only retain and process your personal data on the basis of your free, informed, specific and unambiguous consent (see below).

## **Disclosure and distribution of your personal data**

Your personal data are normally handled only by our employees, and we do not disclose these data to third parties. In some situations, we may enter into a Non-Disclosure Agreement (NDA) or Data Protection Agreement (DPA) with Data Controllers (companies or organisations) regarding the confidentiality of data contained in their documents.

However, data contained in documents for translation may be sent to, and processed by, external suppliers (freelance translators and interpreters) as part of our normal language service provision. Under the terms of our subcontractor agreements with freelancers, including those resident and working outside the EU/EEA area, all subcontractors are bound by a minimum requirement to comply with the GDPR. These agreements will include specific instructions regarding the retention and deletion of personal data by freelancers.

We do not sell or trade your personal data. We maintain registers of our clients and subcontractors for contact purposes, but do not use your personal data to carry out global analyses or the profiling of individuals for marketing purposes.

## **Data security measures**

We take all reasonable precautions to protect your personal data from loss and unauthorised access and use. Our data security measures include both technical controls and office procedures that are constantly being adapted and updated in response to relevant requirements.

All access to Comprendo's digital files and documents is via a dedicated external server provided and supported by a reputable Norwegian IT services provider. Only our employees and the service provider's system administrator have access to our dedicated file area on this server. The system also hosts the third-party software that we use to carry out translation assignments and other functions. Security measures include a two-factor authentication system (using a standard password and remote SMS), encrypted log-in, an anti-virus system installed on the server, and a firewall system. Access to our employees' office-based and home computers is also password protected. Freelancers and other external parties have no access to our server.

## **Data retention and deletion**

We retain your personal data only for as long as is necessary to provide you with a professional and high-quality service, and to meet our legal and regulatory obligations. All data that are not relevant to these purposes are deleted. Retention times for your personal data may vary, and we reserve the right to maintain an archive and fully functional back-up copies of completed materials as long as our client relationship with you continues. However, you have a right, at any time, to specify the retention time, and to instruct us to delete your personal data/destroy hard copies (see below).

## **Your consent, your rights**

Under the GDPR, we can only retain and process your personal data with your free, informed, specific and unambiguous consent. Most importantly, this also means that you have the right, at any time, to modify or withdraw your consent regarding our storage and handling of all or part of your personal data.

Your consent means that you have the right to free access to the personal data that we retain and process on your behalf. You are entitled to inspect and/or receive details from us as to how we store and process these data. You may, at any time, make corrections to data that you believe to be inaccurate, make deletions, and instruct us to place limits on the extent of processing and with whom we share your data. You are also entitled to specify time limits on our retention of your personal data.

You also have the right to submit a complaint to us and/or the relevant supervisory authorities regarding our handling of your personal data. If you have any questions about this Privacy Policy, or if you wish to exercise your rights to inspect, correct or delete your data, please contact our General Manager Kristin Eikeland at [post@comprendo.no](mailto:post@comprendo.no) / +47 4000 1898.